From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 8:06:55 AM

Submitted on Mon, 06/10/2024 - 08:06

Submitted values are:
Contact Info

Name:: Alex Wong
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Hello Chair Lee and City Councilmembers, my name is Alex, and I am a member of RideSD. I'm here to express my support for the University City Community Plan Update. The SMART Corridors proposed in this plan will improve our transit system by giving buses their own right-of-way. This will make transit faster, more reliable, and more competitive, boosting ridership and enhancing the experience for current riders. I urge you to approve this plan and implement the SMART Corridors as soon as possible. Thank you!"

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/41931

From:	Kessler, Natalie on behalf of SD Council Committee
To:	Kessler, Natalie
Subject:	FW: LUH June !3 Item 6 UCCPU Recommendations
Date:	Monday, June 10, 2024 10:36:48 AM
Attachments:	Letter 6-10-24 to LUH on UCCPU .pdf
Importance:	High

From: John Ziebarth [redacted]
Sent: Monday, June 10, 2024 7:14 AM
To: SD Council Committee <CouncilCommittee@sandiego.gov>
Cc: Lukes, Suchitra <SLukes@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>
Subject: [EXTERNAL] LUH June !3 Item 6 UCCPU Recommendations
Importance: High

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

Dear LUH Committee Members:
Many like myself would like to see the UCCPU move forward after all of the hard work, but I can't not recommend it with the unprecedented requirements for *public urban space* and the level of specificity in the SDRs which I believe not only contradict current municipal code regulations but will probably deter many redevelopment and housing projects because they will be forced into discretionary permits to request deviations which will lead to time delays, costs, and unknown results. Attached is a letter with six recommendations that, I believe can made without environmental impact or significant delays in the Update approval if Planning staff is so directed. I urge you to consider them. I have copied planning on this email, so that we might work on this together to create a better final product. Because the SDR regulations are in the community plan versus in the zoning code, a community plan amendment will be required to tweak the regulations as problems are discovered. I know because as an architect and planner, I spent 8 years volunteering to help develop the LDC and 20 years helping to tweak and refine it for issues that were discovered. It is critical to get the Update correct.

Thank you for your consideration.

John Ziebarth
[redacted]

John Ziebarth
[redacted]
June 10, 2024

Land Use & Housing Committee
202 C Street
San Diego, CA 92101

Ref: University Community Plan Update Item 6 on LUH June 13, 2024

Dear Committee Members:

Many, like me, want to see the University Community Plan Update move forward. One of the goals of the plan is to promote growth, redevelopment, and housing. But I have serious concerns that the requirements for Urban Public Space and the specificity of the Supplemental Development Regulations (SDRs) will deter redevelopment and housing.

1. Commissioner Boomhower asked if the city was transferring liability for public space onto private property owners. Neither the Planning Director nor the City Attorney could say no or answer the question. Two apartment owners whose old properties are ripe for redevelopment approached me afterwards to say that they are fighting to keep insurance companies from canceling their current insurance today and they have no idea how they will get an insurance company to insure the liability of public use of private property.
   Recommendation: Change *urban public space* to *urban open space* and eliminate the requirement for public access hours. The staff has already eliminated the requirement for public easements from the draft plan for this very reason.
2. Commissioner Moden raised concerns about the impacts of *urban public space*. Valid concerns considering 5% *urban public space* of the premises requirement is unprecedented not only in San Diego, but in the entire country.
   Recommendation: Reduce requirement from 5% to 1 or 2% like Seattle or San Francisco which are the only two cities in the country to require Public Open Space and that requirement is limited to office buildings over a certain size in the downtown area in San Francisco or around the Amazon corporate headquarters in Seattle.
3. The University City Community Planning Group's report recommends incentivizing *urban public space* not requiring it. This is what New York City has successfully done.
   Recommendation: Adopt the UCCPG recommendation and incentivize, but not require urban open space. This eliminates the city from mandating the transfer of liability of public space onto private property owners previously discussed.
4. Commissioner Moden raised concerns about the impacts of the specificity of the SDRs.
   The level of specificity in the UC Update is unprecedented in the municipal code and the over-regulations will be a deterrent to redevelopment and the construction of housing. This specificity does not even exist in the currently proposed Hillcrest Update. This level of specificity belongs in the zoning regulations where it can be tweaked over time without a community plan amendment. This level of specificity creates contradictions and redundancy with the Municipal Code. The City has spent millions of dollars and hours over the last 30 years through the Land Development Code and its revisions to eliminate redundancy and contradictions in the development regulations. I know because I volunteered for 28 years to assist in that development to reduce the contradictions like what this Update creates.
   Recommendation: Reduce the specificity in the SDRs and use SDRs that reference municipal code like the Hillcrest Update.
5. Housing is already paying a park fee. They shouldn't have to pay twice to provide onsite urban public space also.
   Recommendation: Eliminate requirement for *urban public space* for housing similar to Seattle and San Francisco.
6. *Paseos* are listed as *urban public space* in the Update, but was removed as a tool for CPIOZ.
   Recommendation: Include *paseos* as a tool to implement CPIOZ.

With the inclusion of these six recommendations, I can support the adoption of the Update.

Respectfully,

John C. Ziebarth

From: Kessler, Natalie on behalf of SD Council Committee
To: Kessler, Natalie
Subject: FW: [EXTERNAL] RideSD Letters for LU&H 6/13/24
Date: Monday, June 10, 2024 10:41:31 AM
Attachments: RideSD_Hillcrest FPA LOS_LU&H.pdf
RideSD_BlueprintSD LOS_LU&H.pdf
RideSD_University City CPU LOS_LU&H.pdf

From: RideSD Contact <contact@ridesd.org>
Sent: Monday, June 10, 2024 8:00 AM
To: SD Council Committee <CouncilCommittee@sandiego.gov>
Cc: Connor Proctor <connor@ridesd.org>; Leif Gensert <leif@ridesd.org>
Subject: [EXTERNAL] RideSD Letters for LU&H 6/13/24

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

Good Morning Council Committee Staffers,

We hope you enjoyed your weekend! RideSD sends this email to share our letters to the Councilmembers of the Land Use and Housing (LU&H) Committee for the meeting this Thursday, June 13th, 2024.

There is one letter for Item-5 (Blueprint SD), another for Item-6 (University City CPU), and another Item-7 (Hillcrest FPA).

Please include these on the public record and share with the Councilmembers.

Thank you so much!

RideSD
www.RideSD.org

www.ridesd.org
contact@ridesd.org

RideSD Supports the University City Community Plan Update

Honorable Chair Lee and Land Use & Housing Committee Members,

RideSD is San Diego's premier transit education and advocacy organization. Our mission is to promote world-class transit for San Diego through education, community building, and advocacy. Our vision is to transform San Diego's transportation culture and infrastructure to make transit the preferred option to connect communities.

We write to express our strong support for the University City Community Plan Update.

RideSD is particularly enthusiastic about the proposed SMART Corridors and Flexible Lanes on Genesee Avenue, Nobel Drive, La Jolla Villa Drive, Via La Jolla Drive, and Gilman Drive. The plan states these lanes can contain right-of-way for transit. **Dedicated bus right-of-ways will significantly improve commute times, making the bus a more competitive transportation option and increasing ridership**.

Additionally, the plan addresses San Diego's severe housing shortage by allowing the building of more homes. As a major regional employment center with a burgeoning life sciences presence, we can better meet our housing and climate goals by building homes near jobs.

We also want to highlight the success of transit in the area. The recently completed expansion of the Blue Line trolley to UCSD and UTC is the highest ridership line in the region, demonstrating the community's strong demand for efficient public transit options. Similarly, the SuperLoop bus system boasts the highest ridership for buses in the region[1], revealing the potential for University City to become a model community where transit is the preferred option for commuting.

Thank you for your consideration,

Connor Proctor
Vice President
RideSD

[1] San Diego Metropolitan Transit System. (November 2023). POLICY 42 PERFORMANCE MONITORING REPORT FY 2023: JULY 2022 - JUNE 2023. Retrieved from https://www.sdmts.com/about/reports-records-and-policies

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 11:20:30 AM

Submitted on Mon, 06/10/2024 - 11:20

Submitted values are:
Contact Info

Name:: Erick Vieyra
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a renter in District 3 (East Village), I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals. All of these changes are desperately needed by the city of San Diego and must be treated as a priority.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/41961

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 11:40:39 AM

Submitted on Mon, 06/10/2024 - 11:40

Submitted values are:
Contact Info

Name:: James Fowler
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a homeowner in Mission Hills, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. I just moved my parents into the neighborhood, and I was astounded at how high rents are. We definitely need more housing!

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/41965

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 11:43:12 AM

Submitted on Mon, 06/10/2024 - 11:43

Submitted values are:
Contact Info

Name:: Ivan Gonzalez
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Hi city council, I've been a San Diegan for 5 years now and been living in district 3 for a few years. I am writing to support the community plan update because I believe that housing needs to be a priority. There is a housing crisis and the solution is more housing. There is plenty of space already built up to increase density and will help prevent more urban sprawl which is not good for the environment. Please vote yes on this CPU. Thank you all.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/41968

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 11:57:20 AM

Submitted on Mon, 06/10/2024 - 11:57

Submitted values are:
Contact Info

Name:: Manny Rodriguez
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I support the University City Community Plan Update. The area is a major hub for jobs but yet suffers from high housing costs due to the shortage of housing. The update will allow for more homes to be built near these jobs, which will ease costs while also reducing VMTs since people will live near where they work.

I am also supportive of the mobility solutions proposed in the update, especially the SMART Corridors and Flexible Lanes, which the plan states will have right-of-way for transit.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/41972

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 1:01:11 PM

Submitted on Mon, 06/10/2024 - 13:01

Submitted values are:
Contact Info

Name:: Barton Lynch
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I am a homeowner in district 3. I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. Housing is too expensive in the neighborhood and we need safer ways to traverse San Diego by bike.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/41983

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 1:02:38 PM

Submitted on Mon, 06/10/2024 - 13:02

Submitted values are:
Contact Info

Name:: Brandon Comella
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a renter in District 3, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. I've had to move further out of the city to find more affordable housing. I've had much difficulty navigating around the city because the lack of the lack transit options and the fact my family and friends have had to move to further out, less accessible neighborhoods.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/41984

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 1:07:23 PM

Submitted on Mon, 06/10/2024 - 13:07

Submitted values are:
Contact Info

Name:: Jonathan Leo
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a homeowner in District 6, I strongly support the University Community Plan Update. This plan will allow more housing especially affordable housing, expand transportation choices for everyone, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life. Furthermore changing shopping plazas close to major transit hubs like The Shops at La Jolla Village, La Jolla Village Square, UTC, and Costa Verde Center to mixed use walkable developments can ease housing pressure on the county and provide beautiful areas for young professionals, civil workers, university faculty, students and support staff to live in.

I've seen the need for more housing and transportation options in this area. Availabilities, let alone rents, are hard to come by in this area and within the district at large. Mira Mesa already adopted a community plan to double housing in the neighborhood and University City must follow suit. Good transit connectivity can ease traffic in the region as well.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/41987

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 2:17:54 PM

Submitted on Mon, 06/10/2024 - 14:17

Submitted values are:
Contact Info

Name:: Anna Crotty
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a homeowner in District 1, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals. I have two children who will be adults looking for their own housing in the next few years, and unless we build a LOT more housing in areas where people can get to good jobs, they're going to have to leave the region.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

--Anna Crotty

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42000

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 3:45:42 PM

Submitted on Mon, 06/10/2024 - 15:45

Submitted values are:
Contact Info

Name:: Jeremy Bryan Fancher
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a [renter/homeowner/student] in District [X], I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. Bicyclists and pedestrians are regularly maimed and killed by drivers on the excessively wide and overbuilt throughfares. The lack of easy and safe walking and rolling in, of all places, sunny San Diego is a huge missed opportunity. The vast majority of throughfares in San Diego are overly wide and prioritize only "going fast" in cars.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42015

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 4:08:55 PM

Submitted on Mon, 06/10/2024 - 16:08

Submitted values are:
Contact Info

Name:: Christopher Margraf
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a renter in District 6, where I have been living for more than 2 years, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area for everyone, especially in terms of housing affordability for students and transit accessibility for the elderly and people with movement disabilities. I have seen the struggles of people trying to get places safely, whether it is someone hurrying across a crosswalk or a person trying to bike on a six-lane road, these changes are urgently needed. Improving transit and bicycle/wheeled options will allow people to be safer while participating in these activities, incentivizing them to choose those options more, thus reducing reliance on cars and helping to meet our emissions goals.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42024

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 4:38:23 PM

Submitted on Mon, 06/10/2024 - 16:38

Submitted values are:
Contact Info

Name:: Elizabeth Lee
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a renter in District 6, where I have been living for more than 2 years, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area for everyone, especially in terms of housing affordability for students and transit accessibility for the elderly and people with movement disabilities. As a graduate student, I have personally witnessed and experienced the lack of affordable housing amongst my community of grad students and young professionals. This plan to allow more housing to be built addressing this issue and improving the lives of grad students and all other members of the community.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42037

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 4:41:35 PM

Submitted on Mon, 06/10/2024 - 16:41

Submitted values are:
Contact Info

Name:: Jay Robinson-Duff
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As an active member of the North Park community planning group, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. The ability for San Diego to achieve these steps forward in each neighborhood lessons the collective burden on any individual neighborhood. Many hands make light work, and we need to take that motto to heart, and all commit to substantial steps forward in density, and transit.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42039

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 9:07:43 PM

Submitted on Mon, 06/10/2024 - 21:07

Submitted values are:
Contact Info

Name:: Shelby Huffaker
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a current renter in District 3, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

On a personal level, I was born and raised in University City and have seen the region grow with my own eyes over the past 20 years. The benefits of this growth are evident: jobs, business, and tourism have all flourished. However, to meet the needs of both new and long-time residents, we must build more affordable housing, walkable/rollable streets, and green spaces in order to continue this upward trend and ensure that those who have helped create the vibrant community that University City is today can continue to live, work, and play there.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42078

From:	SDGov Webmaster
To:	Kessler, Natalie
Subject:	Webform submission from: Land Use and Housing Committee Public Comment Form
Date:	Monday, June 10, 2024 8:12:09 PM

Submitted on Mon, 06/10/2024 - 20:12

Submitted values are:
Contact Info

Name:: Jairo Avalos
City:: _
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42069

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 10, 2024 6:41:00 PM

Submitted on Mon, 06/10/2024 - 18:40

Submitted values are:
Contact Info

Name:: Spencer Hutchins
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a homeowner in District 3 and frequent visitor to University City for business and leisure, I strongly support the University Community Plan Update and all efforts to build more housing in San Diego.

This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I worry that my children will never be afford to live in San Diego as adults if we don't start increasing housing production immediately in this city. Please approve the University CPU & build on it with other efforts across the city to provide a more vibrant, inclusive & affordable community for us all to live in.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42056

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 8:10:09 AM

Submitted on Tue, 06/11/2024 - 08:10

Submitted values are:
Contact Info

Name:: Gail Laurie Friedt
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: ITEM 6

Comments::
As a homeowner in District 3, I strongly support the University Community Plan Update. Every community must do their part in supporting new housing, expanding transportation choices and creating new public spaces. By working together we can meet our climate goals and make San Diego a place for future generations.

I've seen the need for more housing and transportation options in this area through the stories of students who have to live in their vehicles or triple up in a room. Additionally, any existing housing is out of the reach of most families as they have been priced out.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42101

June 11, 2024

Land Use and Housing Committee
202 C Street, M.S. 413
San Diego, CA 92101

RE: University Community Plan Update
Item 6 on Land Use and Housing Committee Agenda

Dear Committee Members:

This letter serves to comment on Urban Public Space requirements in the University Community Plan Update (CPU) Supplemental Development Regulations (SDRs). The comments in this letter pertain to the liability and the scope of the required urban public space in the SDRs.

The SDRs related to urban public space are unclear if the required public space on private property would make the private property owners become legally liable for incidents in the public space. This issue was raised by Commission Boomhower and Chair Moden during the Planning Commission hearing. The City Attorney and the City's Planning Director could not clearly state if the private property owner would be legally responsible for public space on private property. Private property owners cannot reasonably obtain insurance for public use on residential private property. As a result, the SDRs would impede the redevelopment of these properties. Our recommendation is to change "urban public space" to "urban open space" and eliminate the requirement for public access hours.

The urban open space should not be required for housing projects. This should only be an option in office or retail projects, e.g., projects open to the public, to incentivize the provision of urban open space. Housing projects may not be able to obtain insurance for their projects if there is public access through their residential private property. Even without such a requirement, insurance coverage for our residential properties have been cancelled frequently. When we are able to obtain coverage the costs have skyrocketed. Furthermore, housing projects are subject to the Parks Development Impact Fee. Our recommendation is to eliminate the urban open space requirement for housing projects.

Thank you for considering these comments. Should you have any questions, please contact me at erinwalsh@walshchacon.com or 858-692-0738.

Respectfully,

Canyon Park Apartments, LP
A California Limited Partnership
BY: CP Apartments GP, Inc
A California corporation
Its General Partner

BY:

Erin Malone Walsh, President

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 12:21:08 PM

Submitted on Tue, 06/11/2024 - 12:21

Submitted values are:
Contact Info

Name:: Wesley Morgan
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6 - University Community Plan Update

Comments::
I support the UC Community Plan Update - and wish that higher density would be entertained in the high-resource areas south of Rose Canyon.

San Diego faces many challenges - climate change, housing affordability, and accessible transit options. The University Community has billions in recent transit investment (including 6 trolley stations), large job clusters, and world class educational and research facilities.

I have two daughters studying public health and Nursing. They've identified the medical facilities in UC as target employers as they kick off their careers - but have also acknowledged they would not be able to afford to live in the area without the planned growth in today's update.

Direct access to these resources provides the community a unique opportunity to develop housing and support employment opportunities at scale and on a personal level for many like me and my own family.

The existing infrastructure in our high and highest resource areas should be shared beyond those who are fortunate enough to reside there today.

These updates provide a generational opportunity for San Diego to build a community that is economically sustainable, inclusive, and affordable.

I am grateful for the City's hard work that takes advantage of University City's unique resources and response to the community's needs.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42149

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 1:09:00 PM

Submitted on Tue, 06/11/2024 - 13:08

Submitted values are:
Contact Info

Name:: Vahan Hartooni
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Hello Chair Lee and City Councilmembers, my name is Vahan Hartooni, and I am a member of RideSD. I'm here to express my support for the University City Community Plan Update. I frequently commute to UTC and unfortunately the blue line is just not a practical option as the walk from the station to our offices are over 20 minutes by foot. We need buses to connect trolley stations and office parks. The SMART Corridors proposed in this plan will improve our transit system by giving buses their own right-of-way. This will make transit faster, more reliable, and more competitive, boosting ridership and enhancing the experience for current riders. I urge you to approve this plan and implement the SMART Corridors as soon as possible. Thank you!

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42159

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 12:50:46 PM

Submitted on Tue, 06/11/2024 - 12:50

Submitted values are:
Contact Info

Name:: Leif Gensert
Email:: [redacted]
City:: San Diego
State:: Californi

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: #6

Comments::
Hello Chair Lee and City Councilmembers,

my name is Leif Gensert, and I am a member of RideSD.

I'm here to express my support for the University City Community Plan Update.

The SMART Corridors proposed in this plan will improve our transit system by giving buses their own right-of-way. This will make transit faster, more reliable, and more competitive, boosting ridership and enhancing the experience for current riders.

I urge you to approve this plan and implement the SMART Corridors as soon as possible.

Thank you!

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42153

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 12:44:31 PM

Submitted on Tue, 06/11/2024 - 12:44

Submitted values are:
Contact Info

Name:: Maxwell Gergen
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6 and 7

Comments::
I would like to comment in support of Plan Hillcrest and the University Community Plan Update. We need more housing in areas where people work and these 2 districts are big employment centers. We need denser housing in these areas. And we need better public transit access and more walkable design in these neighborhoods. These 2 community plans have all of that and more. I support both.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42151

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 3:42:53 PM

Submitted on Tue, 06/11/2024 - 15:42

Submitted values are:
Contact Info

Name:: Zack Defazio-Farrell
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Dear commitee members,

I urge you to support the University City community plan update. Housing is desperately needed, and where better to put it next to one of San Diego's biggest employment hubs and largest university? Zoning for more housing would allow students and workers alike to live closer to where they work/study. This would be a true win-win, and would help alleviate traffic congestion caused by long commutes.

Please support the UC community plan update.

Thank you.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42187

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 3:42:01 PM

Submitted on Tue, 06/11/2024 - 15:41

Submitted values are:
Contact Info

Name:: Evan Strawn
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
On behalf of the San Diego Regional Chamber of Commerce, I am registering our support for the University Community Plan Update. The update is important for increasing housing opportunities for our region's employees. As housing costs remain incredibly high and housing stock is too low, our region faces a housing crisis. The UC Plan Update will help alleviate this crisis by providing additional development capacity in an area that is ideal for new homes.

We do wish to echo concerns raised by the Planning Commission regarding the privately-owned public open space requirement (SDR-A.2). We are concerned that the proposed regulations could dissuade the development of commercial space in the area due to the open space requirement that goes above and beyond requirements in other major U.S. cities. Of particular note is a lack of flexibility in the types of amenities that can be used to satisfy the requirement and the lack of consideration of sensitive research facilities that may not be able to allow public access near their workspaces. In addition, the public space requirement may raise liability concerns for any businesses or property managers who would be required to maintain the open space. We hope to see the City provide some clarity on liability and on satisfying this requirement before plan approval.

We urge the Committee to pass the Update on to the full Council to help alleviate our City's housing crisis.

Thank you!

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42186

University Community Plan Update

Liability

Recommendation:

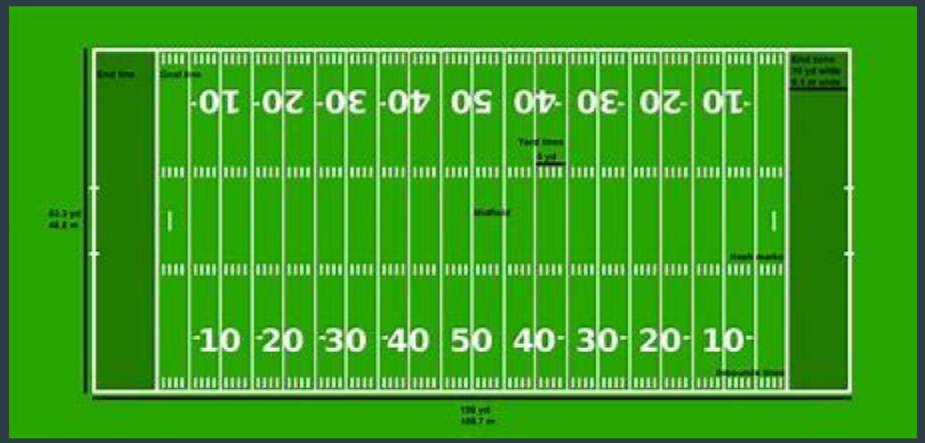
Change *urban public space* to *urban open space* and eliminate the requirement for public access hours

Unprecedented Requirements

- Urban Public Space:
  - In the City: ***No where***
  - In the Country:
    - San Francisco, but only for **large office projects** in downtown
    - ***Seattle*** **and New York** incentives
    - **Office - Not residential or retail**

How big is 5% *urban public space?*

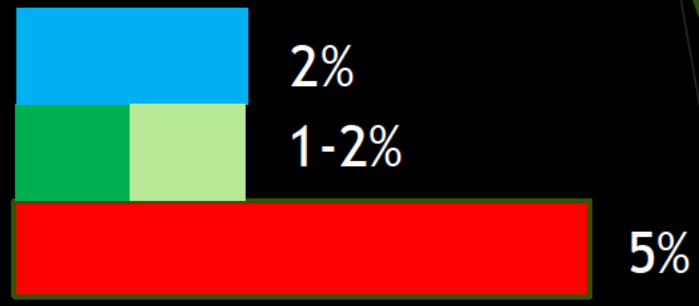
- 5% of 8-acre site is about the size of a Sprouts Market.
- Urban Public Space Value $3.4 million



1.3 x

- 75,000 sf max urban public space is 1.3 football fields or 1.3 Vons Markets
- Urban Public Space value $12.65 million

2% Private Open Space—Seattle
1-2% Public Open Space—San Francisco
5% required by Update



Recommendation:

Reduce Open Space to 1% to 2% similar to San Francisco or Seattle.

Required or Incentivized?

- The University City Community Planning Group's report recommends incentivizing *urban public space* not requiring it. This is what New York City and Seattle has successfully done.

Recommendation:

Adopt Community Planning Group's recommendation to incentivize not require.

Overly Specific SDRs-

Unprecedented

- Unprecedented in the city
- Unprecedented in the country
- Not even consistent with Uptown Update
- Will deter Redevelopment & Housing
- Contradictory with municipal code
  - Setback
  - Transparency
  - Landscape
  - Building Articulation
  - Etc.
- Community Plan Amendment required to refine or adjust SDRs

SDRs

- Update's Inspirations do not comply with SDRs

SDRs

- The Update's Inspirations do not comply with SDRs

SDR Recommendation:

Make University City's SDRs similar to Hillcrest/ Uptown SDRs

Paseo

- Listed as an Urban Public Space, but not included as a tool in SDRs for CPIOZ

Recommendation:

Include Paseos in the Tool-Box to create Urban Open Space

Park Fees

- Housing already pays park fees.
- Update requires Urban Public Space (park space)on Private Property or an in-lieu fee in addition to the normal park fee.
- Example: 10 acres site at 74 du/acre (CC-3-8 zone) which can generate 740 du must provide Urban Public Space valued at $3.7 million in addition to paying $5.2 million in Park fees.
- Additional $3.7 million adversely impacts development of Affordable Housing.

Recommendation:

- Allow the value of the Urban Space to be deducted from the Park Fee so cost of development is same as Park Fee.

Recommendations: I recommend approval of the Update with inclusion of recommendations below.

- **Liability:** Change *urban public space* to *urban open space* and eliminate the requirement for public access hours
- **Open Space Area**: Reduce Open Space to 1% to 2% similar to Seattle and San Francisco
- **Incentivize:** Adopt Community Planning Group's recommendation to incentivize not require.
- **Specificity:** Make specificity of University City's SDRs similar to Hillcrest/ Uptown Update.
- **Paseos:** Include Paseos in the tool-box to create *urban open space* for CPIOZ
- **Park Fee**: Allow the value of the *urban open space* to be deducted from the Park Fee so cost of development is same as the Park Fee.

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 6:27:38 AM

Submitted on Wed, 06/12/2024 - 06:27

Submitted values are:
Contact Info

Name:: Kristin Kistler
Email:: [redacted]
City:: University City
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Draft University Community Plan Update.

Comments::
I live in University City and I support the UCPG recommended changes to the Draft University Community Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42248

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 6:16:40 AM

Submitted on Wed, 06/12/2024 - 06:16

Submitted values are:
Contact Info

Name:: DON S NICE
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item 6

Comments::
I am a resident of University City, and this is a single issue for my vote. I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42247

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 5:00:03 AM

Submitted on Wed, 06/12/2024 - 04:59

Submitted values are:
Contact Info

Name:: Hien Zhao
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Non-Agenda Comment

Comments::

I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42242

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 2:55:06 AM

Submitted on Wed, 06/12/2024 - 02:54

Submitted values are:
Contact Info

Name:: Greg Martin
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item 6 - University Community Plan Update

Comments::
I live in Council District 3 and strongly support the University Community Plan Update. We need a lot more housing near job centers and near universities such as UCSD. The proposed changes will allow that to happen. With more people living closer to jobs and schools, this will allow for a shift to more local trips instead of more people traveling longer distances to and from the area. These shorter trips are more easily accomplished through means such as walking, biking, or transit instead of cars with much less resulting climate impact. These types of changes need to be happening all over San Diego.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42240

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 11:27:17 PM

Submitted on Tue, 06/11/2024 - 23:27

Submitted values are:
Contact Info

Name:: Sharon Gehl
Email:: [redacted]
City:: San Diego, CA
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Buildings are particularly bad at telling cultural history, even if that was actually the city's intent. Buildings are just objects that say nothing. They need verbal, written, and/or visual explanations; which are more effective and less expensive than using buildings. The solution is to take all of the proposed historic properties and districts out of the Uptown and Hillcrest Focused Plan Amendment. The proposed Cultural District can talk about culture and history more effectively and for less money than designating buildings. A Cultural District can also evolve over time to keep up with changing needs and new LGBTQ+ history.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42232

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 11:26:00 PM

Submitted on Tue, 06/11/2024 - 23:25

Submitted values are:
Contact Info

Name:: Sharon Gehl
Email: [redacted]
City:: San Diego, CA
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As the Wikipedia entry on "historic preservation" shows, the majority of jobs in US historic preservation are not in Museums, 9%; but in Regulatory Compliance, 70%. In other words, managing the laws and regulations that control officially designated or proposed historic properties. The more properties the City of San Diego Historic Resources Board (HRB) designates, either by force of law or because owners want big Mills Act tax subsidies, the more money professional preservationists in San Diego make. Adding more and more proposed properties to community plans is also a way for professional preservationists to make more money.
Do what is best for the majority of people in San Diego, not what is best for a handful of professional preservationists. Support the City's climate action goals, it's housing needs, and social equity; instead of supporting professional preservationist who make money by getting control of other people's property without paying for it.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42231

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 11:10:18 PM

Submitted on Tue, 06/11/2024 - 23:10

Submitted values are:
Contact Info

Name:: Sharon Gehl
Email:: [redacted]
City:: San Diego, CA
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
The LGBTQ+ Cultural District is a better way to tell history
The proposed Plan Hillcrest LGBTQ+ Cultural District would be the most effective way of supporting the City of San Diego's Strategics Plan objective of "Celebrating the cultural diversity and history of the LGBQT+ community".
The Cultural District will use effective ways of communicating ideas such as words, written and spoken, pictures and color. It would also include a walking corridor that would link cultural interpretive elements and facilitate walking tours, another effective way to communicate ideas.
Identifying and preserving historic resources and districts on the other hand has proven to not only be ineffective in communicating cultural ideas in San Diego; it has done damage to the city by preventing much needed new multifamily housing, lowering property values, and hurting the city's tax base.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42229

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 10:34:53 PM

Submitted on Tue, 06/11/2024 - 22:34

Submitted values are:
Contact Info

Name:: Natacha Schrantz
[redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: UC Plan Update

Comments::
Please respect the integrity of the neighborhoods we have chosen to live in and struggled to pay our homes and taxes in. It is your duty to represent the residents of the community and this is not being done by trying to completely restructure our neighborhoods, homes, streets, access, density, and everything that goes along with it. These actions are irresponsible and a complete disregard of our properties and rights.

STOP NOW!

Additionally, remember that Governor and Genesee Avenues are main arteries in the UC community. We have over half a dozen schools in the vicinity with traffic already becoming congested. How could the 4 lanes of each avenue be reduced to 2?

Begin with the fact that there are few bikers even including our family members. Can anyone realistically picture a mother dropping off 2 or 3 children in multiple schools in the area on bicycles to then arrive at her work in high heels and a suit? Can you really picture biking to the store to purchase groceries for a family of 4 or more with children along? Or hauling all their sports equipment to practices, or even the school backpacks with all the materials?

Respect our neighborhoods and our way of life. We paid and continue to pay for it!

Neither one of you is representing us and no common sense is being applied to these development plans. These plans are only for corporate profit and will simply increase density, create massive traffic and overcrowding, and continue to raise the cost of living, while destroying our neighborhoods with total disregard for the tax paying residents.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42227

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 6:00:57 PM

Submitted on Tue, 06/11/2024 - 18:00

Submitted values are:
Contact Info

Name:: Samuel Meyer
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a renter in District 3, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. When I first moved to San Diego, I would have liked to live in the University City area near where where I worked, but limited housing meant that I had to live further away and drive farther to work.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42212

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Tuesday, June 11, 2024 5:58:44 PM

Submitted on Tue, 06/11/2024 - 17:58

Submitted values are:
Contact Info

Name:: Paul Jamason
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Hi, as a homeowner in District 9 who works at UC San Diego, I strongly support the University Community Plan Update. By enabling over 28,000 new homes in a high-opportunity transit-rich area, the Plan Update will expand access to jobs and education.

During my 26+ years at UC San Diego I've seen the need for housing become an urgent one. Many UCSD employees have left the university because they simply cannot afford to live in San Diego due to high housing costs, which are a direct result of building insufficient housing. This staff turnover has a highly negative impact on the large number of students we serve.

I take the (terrific) new trolley and/or bike to campus, and have experienced firsthand how unsafe University City's high-speed roads are for non-motorists. The Plan Update will add protected bike lanes, dedicated bus lanes, and calm traffic. It's long past time to prioritize all residents' lives over motorist convenience.

The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably and help meet our climate goals. The new parks, greenways, and recreational amenities will improve the quality of life.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42211

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 7:52:25 AM

Submitted on Wed, 06/12/2024 - 07:52

Submitted values are:
Contact Info

Name:: Jennifer Hanna
Email: [redacted]
City:: San Diego
State:: Ca

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42264

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 7:46:14 AM

Submitted on Wed, 06/12/2024 - 07:46

Submitted values are:
Contact Info

Name:: Natacha Schrantz
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Please respect the integrity of the neighborhoods we have chosen to live in and struggled to pay our homes and taxes in. It is your duty to represent the residents of the community and this is not being done by trying to completely restructure our neighborhoods, homes, streets, access, density, and everything that goes along with it. These actions are irresponsible and a complete disregard of our properties and rights.

STOP NOW!

Additionally, remember that Governor and Genesee Avenues are main arteries in the UC community. We have over half a dozen schools in the vicinity with traffic already becoming congested. How could the 4 lanes of each avenue be reduced to 2?

Begin with the fact that there are few bikers even including our family members. Can anyone realistically picture a mother dropping off 2 or 3 children in multiple schools in the area on bicycles to then arrive at her work in high heels and a suit? Can you really picture biking to the store to purchase groceries for a family of 4 or more with children along? Or hauling all their sports equipment to practices, or even the school backpacks with all the materials?

Respect our neighborhoods and our way of life. We paid and continue to pay for it!

Neither one of you is representing us and no common sense is being applied to these development plans. These plans are only for corporate profit and will simply increase density, create massive traffic and overcrowding, and continue to raise the cost of living, while destroying our neighborhoods with total disregard for the tax paying residents.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42263

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 7:44:52 AM

Submitted on Wed, 06/12/2024 - 07:44

Submitted values are:
Contact Info

Name:: fred bonkov
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: xxxx. university city planning

Comments::
DO NOT UNFAIRLY LOAD STATE AND CITY CHANGES ON ONE AREA, UNIVERSITY CITY. DO NOT DESTROY THE U CITY RESIDENTIAL, NEIGHBORHOOD CHARACTER.
HENCE ADOPT THESE UCPG recommended changes to the City's Draft Plan including

lower density maximums per site--including height limit of 50 feet
UCPG recommends maximum 145 du/ac
larger setbacks and transitions for new buildings adjacent to existing residential & open space
reduce City's proposed 100' height limit at South UC shopping centers to 40' at Sprout's center and 50' at Vons center, in line with what the City consistently showed for years in their presentations to the public

stronger policies to protect, enhance and enjoy the natural environment and to integrate nature throughout the Plan Area
requirement that new residential developments and mixed use (commercial and residential on same site) provide public spaces and recreational opportunities (the City required this in a previous draft of the plan but has now made it optional due to opposition by developers)

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42262

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 7:41:22 AM

Submitted on Wed, 06/12/2024 - 07:41

Submitted values are:
Contact Info

Name:: Diane Voit
Email: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42261

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 7:07:15 AM

Submitted on Wed, 06/12/2024 - 07:07

Submitted values are:
Contact Info

Name:: Diane E Ahern
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6 - University Community Plan

Comments::
My husband and I live in University City 92122. We are concerned about the proposed changes in zoning for the retail shopping centers that are just west of the 5 on Nobel that include Trader Joe's/Ralph's/Whole Foods. It's our understanding that the zoning changes as currently proposed could reduce and/or eliminate much of the retail space in those two shopping centers. It would leave the residents in northwest University City, north La Jolla, and UCSD in a food and retail desert.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42257

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 6:54:10 AM

Submitted on Wed, 06/12/2024 - 06:54

Submitted values are:
Contact Info

Name:: Donna Burtch
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-12
Comment Type: Non-Agenda Comment

Comments::
As a UC resident for 34 years, I support the UCPG recommended changes to the Draft University Community Plan Update. I support lower density maximums per site, 40' height (not 100' height) buildings at Sprouts and Vons locations, preservation of our residential area from high density buildings and protection and integration of the natural resources that now define our residential landscape. New residential & commercial developments should include public spaces & recreational opportunities, benefiting the residents, rather than bending to developers seeking to profit from the plan.
Donna Burtch

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42255

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 6:50:54 AM

Submitted on Wed, 06/12/2024 - 06:50

Submitted values are:
Contact Info

Name:: Diane Ahern
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6 - University Community Plan

Comments::
My husband and I are University City residents. I'd like to see an updated traffic study for Governor Drive, both east and west of Genesee, before any plans are developed for changes in traffic patterns, on-street parking, lane reduction and/or restriping. In addition, please insist on larger setbacks and transitions for new buildings adjacent to existing residential and open space; reduce the City's proposed height limit at the Governor Drive shopping centers to 40 feet at Sprouts/UCMarketPlace and 50 feet at Vons/University Square; and keep the requirement that new residential and mixed use developments provide public spaces and recreational opportunities. Thank you.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42254

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 8:20:37 AM

Submitted on Wed, 06/12/2024 - 08:20

Submitted values are:
Contact Info

Name:: Anne Lambert
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Agenda Comment

Comments::
I live near Spreckels Elementary School and the Rec Center I support the UCPG recommended changes to the Draft University Community Plan Update. Any increase in density is a disaster for our neighborhood. Please listen to us, and at least support the UCPG changes.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42268

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 9:10:00 AM

Submitted on Wed, 06/12/2024 - 09:09

Submitted values are:
Contact Info

Name:: Gay Cullinan
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I am a resident of University City and wish to voice my strong opposition to the City's revised University City Plan Update which proposes to more than double the number of housing units and therefore population of our neighborhood.

I will be a single issue voter in the next election and even as a Democrat, I will not be voting for Todd Gloria nor Kent Lee if this plan moves forward.

The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet
and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:

https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42274

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 11:27:21 AM

Submitted on Wed, 06/12/2024 - 11:27

Submitted values are:
Contact Info

Name:: Brian Schroeter
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a long time San Diego renter and former homeowner, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals. While I do not reside in University City, I work there, and the lack of housing nearby my place of work hurts me economically and contributes to pollution and traffic by forcing me into a long commute.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

Lack of housing is San Diego's #1 problem, with knock-on effects negatively influencing: poverty, inequality, traffic, pollution, the job market and the city budget. Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

Sincerely,

Brian Schroeter
92103

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42313

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 11:25:08 AM

Submitted on Wed, 06/12/2024 - 11:25

Submitted values are:
Contact Info

Name:: Jacob Burrell
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a renter in District 8, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. My brother has experienced homelessness, and I know firsthand how critical it is to have sufficient housing options available. Additionally, as someone who spends a considerable amount of time commuting, the lack of efficient transit options is a constant challenge. The University CPU can address these issues.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42311

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 11:19:07 AM

Submitted on Wed, 06/12/2024 - 11:18

Submitted values are:
Contact Info

Name:: Terry O'Neal Percival
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Land Use and Housing Committee

Comments::
I am a long-time home owner and voting resident in University City West. I wish to strongly support the University City Planning Group's recommended changes to the draft University Community Plan Update.
Disregarding San Diego citizens' and local residents' input and concerns about huge changes and drastic increases in housing density (i.e. 290 units per acre) would overwhelm our neighborhood's resources, facilities and services, while increasing traffic, noise and competition for already limited services like parking and retail services like food and groceries.
This new proposal simply ignores the City's own presentations of 40' and 50' height limits at the Sprouts and Von's centers - showcasing new, overwhelming 100' height limits in these residential neighborhoods.
Where are developers' requirement to provide new public spaces, parks and recreations areas - have those been bartered away by elected City officials in an overeagerness to court and gain economic favor with these same developers? Pretending to provide residents and the public input the planning process - and then clearly ignoring that same input is a corrupt, cynical and hypocritical governing "policy." It does not and will not go with out notice or blowback.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42309

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 11:01:15 AM

Submitted on Wed, 06/12/2024 - 11:01

Submitted values are:
Contact Info

Name:: earl kline
Email:: [redacted]
City:: san diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42306

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 10:59:55 AM

Submitted on Wed, 06/12/2024 - 10:59

Submitted values are:
Contact Info

Name:: Kimberly
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: ITEM- 6

Comments::
I support the UCPG recommended changes to the Draft University Community Plan Update: Lower density maximums per site, down to max of 145 du/ac, reduce proposed height limit to 40' at Sprout's Center, requirement that new residential development & mixed used provide public spaces and recreational opportunities.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42303

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 10:59:41 AM

Submitted on Wed, 06/12/2024 - 10:59

Submitted values are:
Contact Info

Name:: Keebler Dawg
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42302

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 10:58:54 AM

Submitted on Wed, 06/12/2024 - 10:58

Submitted values are:
Contact Info

Name:: John Paculdo Koenigshofer
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item 6

Comments::
As a young renter in University City and a constituent of District 6, I strongly support the University Community Plan Update. It is imperative that we expand access to housing in this critical area of the city, which will alleviate the local cost of living and greatly improve the quality of life for University City residents. Limited housing and insufficient transit options do not just impact young people, but residents of every generation; the implementation of the University CPU will benefit everyone. I urge the city council to pass this vital plan and put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42301

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 10:42:07 AM

Submitted on Wed, 06/12/2024 - 10:42

Submitted values are:
Contact Info

Name:: Ellen C Schmeding
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Land Use and Housing - University community plan update

Comments::
I live at 2625 Curie Pl., San Diego and I support the University City planning group's recommended changes, specifically:
1. Lower density maximums per site recommended
2. Reduce the height limitation at both shopping centers
3. Ensure policies are in place that protect, enhance and enjoy the natural environment and integrate nature throughout the Plan Area allowing for parks and other outside areas for residents

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42295

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 10:11:17 AM

Submitted on Wed, 06/12/2024 - 10:11

Submitted values are:
Contact Info

Name:: Janine LoBue Tiefenbruck
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Non-Agenda Comment

Comments::
I'm writing in support of UCPG proposed changes, including lower density in the University City neighborhood and a shorter height limit for shopping centers.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42289

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 12:46:50 PM

Submitted on Wed, 06/12/2024 - 12:46

Submitted values are:
Contact Info

Name:: Linda Scott
Email:: [redacted]
City:: San Diego
State:: CA 92122

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Unknown to me

Comments::
I heartily support the University City Planning Group recommended amendments to the
San Diego Planning Committee plan for future changes in University City.
I have observed that the San Diego Planning Committee has edited out the current permanent residents
(and taxpayers) from the planning process by ignoring the valuable input of the UCPG over many years.

I have lived at my current address for 28 years, enjoying the neighborhood stability, safety, public
library and community parks. People in south UC have shown a strong identification with our community
during that entire time, now including younger families with children attracted by the good public schools
here. As yet, I have seen no acknowledgment of the price that the residents will pay for these enormous
proposed changes within a limited time frame. What might they be? Increased traffic congestion and accidents, noise pollution, co2 pollution, garbage, crime, loss of serenity -- all with potentially negative
effects on health and well being of the residents?

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42331

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 12:44:14 PM

Submitted on Wed, 06/12/2024 - 12:44

Submitted values are:
Contact Info

Name:: Tracy Davis
Email:: [redacted]
City:: San diego
State:: ca

Meeting Info

Meeting Date:: 2014-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item-6

Comments::
I support the UCPG recommended changes to the Draft University Community Plan Update: Lower density maximums per site, down to max of 145 du/ac, reduce proposed height limit to 40' at Sprout's Center, requirement that new residential development & mixed use provide public spaces and recreational opportunities.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42330

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 12:40:42 PM

Submitted on Wed, 06/12/2024 - 12:40

Submitted values are:
Contact Info

Name:: Mark and Maureen Barrow
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::

I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42328

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 12:38:32 PM

Submitted on Wed, 06/12/2024 - 12:38

Submitted values are:
Contact Info

Name:: Jan Devens
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-03
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42327

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 12:38:05 PM

Submitted on Wed, 06/12/2024 - 12:37

Submitted values are:
Contact Info

Name:: Alan Lutze
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 0024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:

https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42325

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 12:37:07 PM

Submitted on Wed, 06/12/2024 - 12:36

Submitted values are:
Contact Info

Name:: Mike Devens
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-03
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42324

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 12:11:15 PM

Submitted on Wed, 06/12/2024 - 12:11

Submitted values are:
Contact Info

Name:: Robert Hanna
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-12
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42320

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 12:54:13 PM

Submitted on Wed, 06/12/2024 - 12:54

Submitted values are:
Contact Info

Name:: Katrina Oprisko
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a homeowner in district 3, I strongly support the University Community Plan Update (CPU). This plan will allow more housing, expand transportation choices, create new public spaces and help meet our climate goals.
By enabling new homes in this area, we are building homes through all of San Diego City to meet our housing demand. All neighborhoods should build new housing. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks and greenways will improve the quality of life.

At the moment, my children cannot afford to live in San Diego. We need more housing options for future generations.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42333

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 9:37:42 AM

Submitted on Wed, 06/12/2024 - 09:37

Submitted values are:
Contact Info

Name:: Meryl Berk
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 1

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42280

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 1:49:25 PM

Submitted on Wed, 06/12/2024 - 13:49

Submitted values are:
Contact Info

Name:: MaryAnn Klima
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Draft University Community Plan Update

Comments::
I am a 32 year resident and home owner in University City, 92122. I want to express my support for the UCPG recommended changes to the Draft University Community Plan Update.

UCPG recommends the following changes to the City's Draft Plan and I support these changes:
-lower density maximums per site
-City's Plan Update would allow 290 du/ac (dwelling units per acre); UCPG recommends maximum 145 du/ac
-larger setbacks and transitions for new buildings adjacent to existing residential & open space
-reduce City's proposed 100' height limit at South UC shopping centers to 40' at Sprout's center and 50' at Vons center, in line with what the City consistently showed for years in their presentations to the public
-stronger policies to protect, enhance and enjoy the natural environment and to integrate nature throughout the Plan Area
-requirement that new residential developments and mixed use (commercial and residential on same site) provide public spaces and recreational opportunities (the City required this in a previous draft of the plan but has now made it optional due to opposition by developers)
Thank you for consideration.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42344

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 2:26:41 PM

Submitted on Wed, 06/12/2024 - 14:26

Submitted values are:
Contact Info

Name:: Bill Li
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
It's ridiculous that the Chancellor of UCSD Pradeep Khosla gets to live in a tax exempt 7 acre mansion in 9630 La Jolla Farms Rd while so many of his students are heavily rent burdened or even homeless! We not only need to approve this plan to build more housing for students and workers in the area, but also need to begin ask ourselves: why is housing so unaffordable in the area? Could it be because we let so many entitled Prop13 beneficiaries and Khosla live in all these fancy mansions that contribute to our water and climate crisis? Build more dense housing so the students can live in the area and we can prevent the waste of resources when we build sprawl!

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42352

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 2:34:27 PM

Submitted on Wed, 06/12/2024 - 14:34

Submitted values are:
Contact Info

Name:: Roxieann Danner
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42355

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 2:53:42 PM

Submitted on Wed, 06/12/2024 - 14:53

Submitted values are:
Contact Info

Name:: Arthur Pajak
Email: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a homeowner in District 3, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. I am a parent of a student at UCSD and the housing crunch is real for students there. Many students live off-campus and they should be able to live closer and have more ways to get to campus easily and safely, including transit, biking and walking - anything but driving.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42364

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 2:59:02 PM

Submitted on Wed, 06/12/2024 - 14:58

Submitted values are:
Contact Info

Name:: Trevor Cappa
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I am a homeowner in District 3, I urge the council to support the University Community Plan Update. This plan will allow for more housing, which is desperately needed in my neighborhood, which has underserved public transportation and housing needs.

By enabling new homes in a high-opportunity area, we can begin to make a dent in our housing crisis, which should be the number one priority of every decision the council is making. This crisis hurts the people who need help the most the hardest. Our homelessness crisis and the flight of young people from our city is a symptom of this deep, deep problem. It also ironically helps people like me, wealthy homeowners, who need the least help by taking money out of the pockets of younger, poorer people in the form of higher rents. Not allowing for more housing is a tax on the poor to fund subsidies for the rich.

I've seen the need for more housing and transportation options in this area. Our homelessness crisis is directly caused by the high cost of housing and our most vulnerable neighbors are hurt the most by our restrictive zoning and building regimes. What little crime we have in San Diego is driven by crimes of poverty. By allowing more housing and spending less time on review, we can save money and grow our tax base to have money we need to provide services to our most vulnerable community members by helping them get off the streets when they are forced there by high rents and prevent more of our neighbors from being driven there in the first place.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42366

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:16:07 PM

Submitted on Wed, 06/12/2024 - 15:15

Submitted values are:
Contact Info

Name:: Krishna Hammond
Email: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item 6

Comments::
As a renter in District 3, I strongly support the University Community Plan Update. This plan will allow more housing, improve biking infrastructure, improve the overall quality of life in our district, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. While I can bike within some protected lanes downtown, visiting places like Irvine demonstrate the benefits of skyway or separated bike lanes for making it feasible to use my bike as a primary mode of transportation. Also, the high price of rent in this district makes it challenging to plan for the future or to raise a family, and would eventually force us to move.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42370

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:20:49 PM

Submitted on Wed, 06/12/2024 - 15:20

Submitted values are:
Contact Info

Name:: Trevor van Leeuwen
Email: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a renter in District 3, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. Many of my friends are or have been students at UCSD and the price of housing and effective requirement to own a car are absolutely crippling to their finances.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42373

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:33:13 PM

Submitted on Wed, 06/12/2024 - 15:33

Submitted values are:
Contact Info

Name:: Zach Thompson
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a resident of in District 3, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. We just spent all that public money building the excellent blue line trolley extension, which provides people in the University Area with incredible transit access to downtown and the border, and all the stops in between, and we need to build housing in the neighborhood to take advantage of that access.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42378

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:32:59 PM

Submitted on Wed, 06/12/2024 - 15:32

Submitted values are:
Contact Info

Name:: Don Danner
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I am opposed the the city's revised plan update.The plan does not consider our limited infrastructure,No schools, fire stations or police coverage.Both the Vons and Sprouts center are way to high in the plan . Making Governor Drive a two lane road would be a disaster for emergency services as well as everyday traffic.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42377

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:30:39 PM

Submitted on Wed, 06/12/2024 - 15:30

Submitted values are:
Contact Info

Name:: Joan Marvil
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I am opposed to the City's revised University City Plan Update. This community of residential single family homes has one Main Street, that being Governor Drive. There are two elementary schools and a junior high near the high density proposal along Governor Drive. Also, Stanley Park is sandwiched between two of the schools. The proposed density is way too high for this active area with a high number of children attending school and park activities. Height limits at the Sprouts and Vons shopping centers should be lowered to a manageable amount, preferably no more than 40 ft. I urge you to act sensibly and consider the UC Plan Update seriously.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42376

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:34:33 PM

Submitted on Wed, 06/12/2024 - 15:34

Submitted values are:
Contact Info

Name:: Joseph Tinglof
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a homeowner in District 7, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. The area near the trolley stops especially should have much more housing. Increased trolley ridership and decreased car dependence should be the city's goal.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42379

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:41:28 PM

Submitted on Wed, 06/12/2024 - 15:41

Submitted values are:
Contact Info

Name:: Andrea Lehman
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42382

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:34:33 PM

Submitted on Wed, 06/12/2024 - 15:34

Submitted values are:
Contact Info

Name:: Joseph Tinglof
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a homeowner in District 7, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. The area near the trolley stops especially should have much more housing. Increased trolley ridership and decreased car dependence should be the city's goal.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42379

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:51:41 PM

Submitted on Wed, 06/12/2024 - 15:51

Submitted values are:
Contact Info

Name:: Bonnie Lou Kutch
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
UC PEEPS plans to make a 10-minute presentation. Speakers include, in this order, Bonnie Kutch, Michael Kozma, Barbara Gellman. I sent this pdf file to the Council Committee email address shown on the agenda. Thank you.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42385

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:47:05 PM

Submitted on Wed, 06/12/2024 - 15:46

Submitted values are:
Contact Info

Name:: Oscar Leija
Email: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a homeowner and student in District 4, I wholly support the University Community Plan Update which will create more housing, expand transport choices, create new public spaces, and help meet San Diego's climate goals.

By introducing 28,000 new homes to our city's scarce housing supply in a high-opportunity transit-rich area, it will expand access to jobs and education and keep our city growing to the benefit of everyone. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The much needed new parks, greenways, and recreational amenities will improve quality of life.

I personally know other students in San Diego who attend or have attended UCSD and they all have expressed the need for more housing close to the university. Each of them in turn know other students, faculty, and working class people who have the same complaints about housing and transport options in this area. It is a story that, unfortunately, is almost trite because of how common it is all across our city and THIS is a chance to make a difference in this area. Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future. Thank you!

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42383

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:53:17 PM

Submitted on Wed, 06/12/2024 - 15:53

Submitted values are:
Contact Info

Name:: Clancy Smith
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Dear Council,

I am writing to express my strong support for increasing housing density and the development of more homes near transit hubs and job centers in University City and Hillcrest.

San Diego is experiencing a significant housing crisis, and addressing this issue requires bold and proactive measures. By focusing on denser housing developments near transit and employment centers, we can make meaningful progress toward solving the homeless, affordability, and climate crisis. This approach will not only provide much-needed housing but also promote sustainable and convenient living options for our residents.

University City and Hillcrest are prime areas for such developments. Both neighborhoods are well-served by public transit and are home to numerous job opportunities. Increasing the housing density in these areas will help reduce traffic congestion, lower greenhouse gas emissions, and support local businesses by providing them with a larger customer base.

University City is near the major biotech hubs in San Diego. We have constant traffic on the freeways because we have zoned ourselves into oblivion and have given people no other option than to commute by car using the freeways into this major job center.

Hillcrest has always been a dense neighborhood and was originally a streetcar suburb. It is designed to be dense and density is what makes it such a great place to live. Also, its close proximity to downtown will allow people to commute by bus and bike to downtown job centers easily, freeing up traffic and giving people an alternative.

Furthermore, denser housing developments can lead to more vibrant and diverse communities. By allowing more people to live near where they work and commute, we can foster a greater sense of community and improve the overall

quality of life for San Diegans.

I urge the City Council to prioritize and expedite plans for denser housing projects in University City and Hillcrest. This is a crucial step towards creating a more equitable, sustainable, and prosperous future for our city.

Thank you for your attention to this important matter.

Sincerely,

Clancy Smith

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42387

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:52:06 PM

Submitted on Wed, 06/12/2024 - 15:51

Submitted values are:
Contact Info

Name:: Rosemary A Perna
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item #6

Comments::
I am opposed to the City's revised University City Plan Update, which proposed to more than double the number of housing units and population. The overall density proposed should reduced to no more than 22,000 additional housing units, per the Community preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. it excludes much needed new schools, as well as fire and police coverage. It is largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes reducing Governor Drive to two lanes. One can only think that the drafters of this plan have never driven on Governor Drive at a time when classes are being dismissed. One can only hope that the voice of reason, rather than economic benefit to a few, will guide the council to its decision.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42386

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 4:05:04 PM

Submitted on Wed, 06/12/2024 - 16:04

Submitted values are:
Contact Info

Name:: Jane Hargrove
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item # 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42394

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:59:28 PM

Submitted on Wed, 06/12/2024 - 15:59

Submitted values are:
Contact Info

Name:: John J. Perna
Email: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: No. 6

Comments::
As a long time resident of University City, I am very opposed to the City's revised University Plan Update! This is a busy and very densely populated community. The overall density proposed must be reduced to no more than 22,000 additional housing units as noted in the Community Preferred Plan. The Plan Update doesn't consider our very limited infrastructure and it doesn't provide ANY new park and recreation centers until after 2043. We would need new schools and serious fire and police coverage. It appears to be largely dependent on upgrades to the public transportation that cannot be guaranteed due to lack of important funding. It is amazing that it proposes that Governor Drive be converted to two lanes that would make it a VERY congested daily and a significantly DANGEROUS change if evacuation was needed.

The height limit at the Sprouts Center should be limited to 40 feet and the housing density 0-28 dwelling units per acre! The height limit at the Vons Centershould be lowered to 50 feet maximum and the housing density to 0-50 dwelling units per acre! Setbacks should be at least 30 feet from any adjacent residential properties! A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be SUSPENDED since it directly conflicts with the UC PLAN UPDATE!!

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42392

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 3:58:45 PM

Submitted on Wed, 06/12/2024 - 15:58

Submitted values are:
Contact Info

Name:: Saad Asad
Email:: [redacted]
City:: SAN DIEGO
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a former University City resident who once lived with six people in a 2-bedroom apartment, I urge the Committee to approve the University Community Plan Update. By allowing up to 28,980 new homes near trolley stations, this plan takes critical action to tackle our housing crisis and dramatically expand access to transit.

The CPU's approach is smart: concentrate growth near transit and invest in great public spaces, bike lanes, and walkable designs to let people drive less. More homes near jobs and transit is a triple win for affordability, quality of life, and sustainability. Just look at the details: up to 290 homes per acre allowed near UTC and Executive Drive stations; new linear parks, plazas, and paseos weaved through pedestrian-friendly, mixed-use villages. Safer bike routes and dedicated bus lanes. If anything, this plan should go further. We need somewhere close to 400 homes per acre near our trolley stations.

The status quo of skyrocketing rents and car-dependent sprawl is unsustainable. Please approve this plan to help create a more equitable University City for future generations.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42391

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 4:37:41 PM

Submitted on Wed, 06/12/2024 - 16:37

Submitted values are:
Contact Info

Name:: David Marvil
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: University Community Plan Update

Comments::
I am in favor of reducing Governor Drive west of Genesee to 1 lane plus a designated bike lane. Currently it is a dangerous stretch for anyone on a bicycle.... road condition, no bike lane, cars consistently exceeding the speed limit. I would also be in favor of speed humps in this area. Much of the traffic in late afternoon is cars cutting through the neighborhood en route to other parts of the city. The height limit at the Sprouts center should not exceed 30 feet and must have underground parking.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42407

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 4:31:11 PM

Submitted on Wed, 06/12/2024 - 16:31

Submitted values are:
Contact Info

Name:: Al Hanna
Email:: [redacted]
City:: San diego
State:: Ca

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42405

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 4:29:51 PM

Submitted on Wed, 06/12/2024 - 16:29

Submitted values are:
Contact Info

Name:: Nelly Hanna
Email:: [redacted]
City:: San Diego
State:: Ca

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42404

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 4:22:05 PM

Submitted on Wed, 06/12/2024 - 16:21

Submitted values are:
Contact Info

Name:: Sharon Gehl
Email:: [redacted]
City:: San Diego, CA
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a homeowner in District 3, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, green-ways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. I've shopped in the UTC mall for years. More people should be allowed to live close enough to walk or bike to it and to all of the jobs in the area. That would mean less traffic on the 5.

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42401

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 4:19:19 PM

Submitted on Wed, 06/12/2024 - 16:19

Submitted values are:
Contact Info

Name:: Joshua
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a student in District 8, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. I've seen the struggle of peers trying to find affordable housing in my university and my school even has student emergency fund for helping students facing the threat of homelessness or financial struggle. There's also a food pantry that gives students free food for those that have little left after barely affording a place to stay. This plan could greatly support those who are enrolled in university but grappling with financial instability.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42400

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 4:16:31 PM

Submitted on Wed, 06/12/2024 - 16:16

Submitted values are:
Contact Info

Name:: Jen Dunaway
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
The UC Plan Update needs to be done with quality planning and community engagement. The DEIR recently received major comments from various stakeholders on the inadequacy of planning to support the document. There is NO RUSH to approve this yet and nothing will change if the City allows a few more months for the DEIR to be updated with community and stakeholder input and legal requirements. PLEASE DO THE RIGHT THING and delay this. The infrastructure, schools, emergency egress, and recreation centers and commercial uses need to be IN the plan, not ignored.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42398

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 4:06:59 PM

Submitted on Wed, 06/12/2024 - 16:06

Submitted values are:
Contact Info

Name:: Phyllis Perlroth
Email:: [redacted]
City:: SAN DIEGO
State:: California

Meeting Info

Meeting Date:: 0024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The Plan Update doesn't consider our limited infrastructure (schools, services). It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate. THERE ARE THREE SCHOOLS AND TWO RECREATIONS CENTERS ON GOVERNOR WITHIN A MILE RADIUS.The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail. UC is NOT the solution to UCSD's housing crisis and nor should my community bare the brunt of the proposed housing for the city. I AM 100% OPPOSED TO THE CURRENT PLAN AND PLEASE LISTEN TO THE COMMUNITY AS WE WOULD SUPPORT SOMETHING REASONABLE, THIS IS NOT REASONABLE!

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42395

YIMBY Democrats of
San Diego County

3401-A Adams Avenue #345
San Diego, CA 92116

info@yimbydemssd.com

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June 12th, 2024

Honorable Chairperson Kent Lee
City of San Diego
202 C St, 10th Floor
San Diego, CA 92101

RE: Item 6: University Community Plan Update

SUPPORT

To Honorable Chair Lee and Land Use and Housing Committee Members:

On behalf of the YIMBY Democrats of San Diego County, please accept this letter regarding our support for the University Community Plan Update.

The YIMBY Democrats of San Diego County are dedicated to growing sustainable housing opportunities in the communities where we live. In addition to developing more affordable and market-rate housing to increase the supply of housing, we believe in prioritizing infill development near transit and employment centers with the goal of increasing our housing supply, leveraging our urban environments, protecting our natural resources and advancing economic inclusion and opportunity for all.

San Diego is facing a housing crisis that requires bold action. The proposed University Community Plan Update will allow for over 28,000 new housing opportunities in one of our most dynamic economic regions. The proposal for a mixed-use, transit-oriented Urban Village offers a bold vision for a more sustainable, affordable, and equitable community.

The plan envisions a series of pedestrianized urban centers connected by the approximately $2 billion investment in the Blue Line and an extensive network of Class IV bike paths. The University City shown in this plan further aligns the community with San Diego's housing goals, guiding principles of the Housing Element, and our City's Climate Action Plan. It affirmatively furthers fair housing by providing opportunities for affordable housing development in the City's High and Highest Opportunity Areas associated with positive economic, educational, and health outcomes for families and children. The direct access to these resources provides the community a unique opportunity to develop housing and employment opportunities at scale for working low-income and middle class families. Additionally, the plan makes an extensive effort to bolster localized

housing options for the employees of the biotech industry clustered in the area.

While we are proud to support the final version of the University Community Plan, we would be remiss to not express our deep disappointment in the disproportionate voice given to wealthy homeowners in South UC through this multi-year process. Their stubborn opposition to previous versions of the plan held significantly more weight in the planning process than the needs of tens of thousands of students and ultimately ended up reducing the amount of housing in South UC.

Overall, The YIMBY Democrats of San Diego County believe that the University Community Plan Update presented today makes reasonable steps towards creating a more equitable, sustainable, and thriving city. We urge the Committee to approve the proposed updates and continue working towards solutions that prioritize housing abundance, affordability, and inclusivity.

Thank you for your time and consideration.

Sincerely,

YIMBY Democrats of San Diego County

**Note: Some of our board members are employed by the City of San Diego but are participating in this policy advocacy solely in their personal capacity. They are not representing their professional roles in this matter.*

Comments to LU&H Committee on UC Plan Update

UC Neighbors for Responsible Growth
a.k.a. UC PEEPS

Fact 1: Blueprint SD is Based on Faulty Data

- UC Plan Update and Hillcrest Focused Plan Amendment approved by Planning Commission based on Blueprint SD being given green light at same meeting
- Blueprint SD was approved **without final PEIR,** based on **outdated** SANDAG Series 14 population projections
- Maps are based on unfunded, unlikely future transit

Fact 2: EIR is Still in Draft Form

- Planning Department hasn't responded to **1,207** pages of comments
- **CEQA requires** recirculation of DEIR if changes are made as a result of comments
- City needs to prepare EIR for Community Preferred Plan
- Blueprint SD should be updated with current data and *funded* transit, then subject to revised EIR

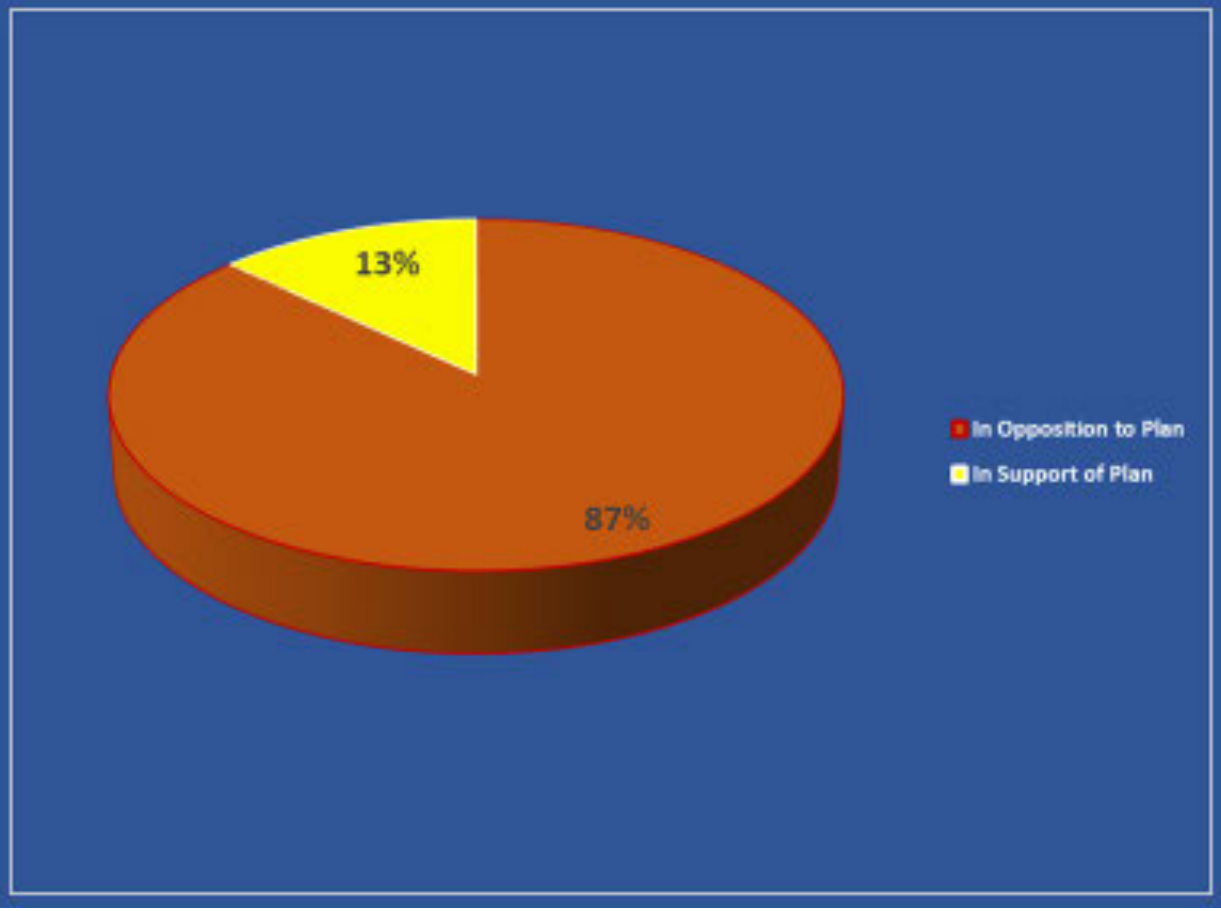
Fact 3. Revised Population Projections

- Most recent Calif. Dept of Finance and SANDAG forecasts are for **65,345** more residents in San Diego by year 2050, down from **226,510** in prior projection
- Current data would necessitate under **25,000** more housing units *citywide*
- Should spread density near all **62 trolley stops** to maximize trolley use

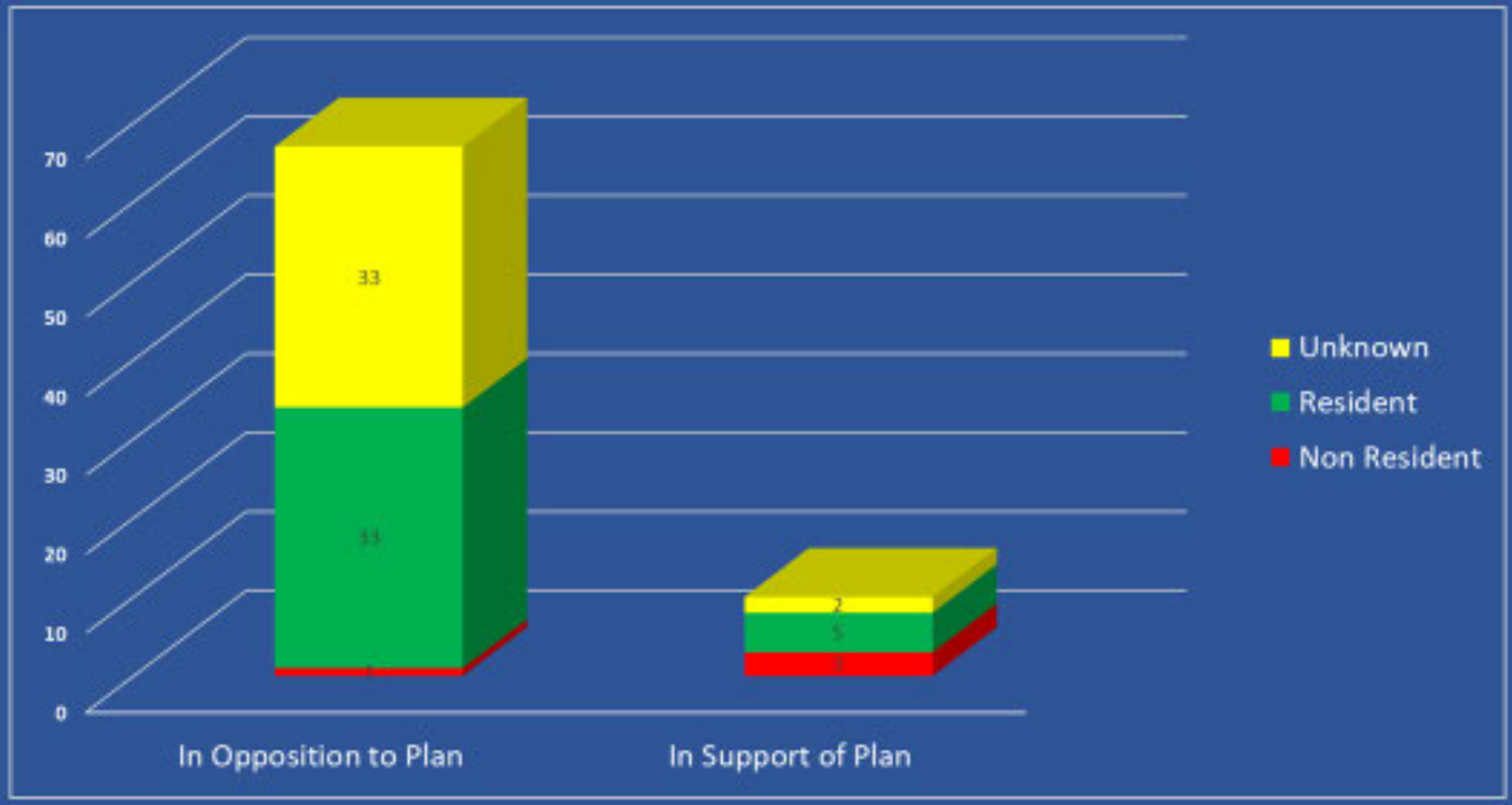
Fact 4: University City is 2nd Densest Community in All San Diego

- UC is built out with **26,520** housing units (plus new UCSD on-campus housing) and **64,206** people; City wants to add another **65,360**
- With projected citywide population growth of **65,345** by 2050, that's asking UC to accommodate **more than 100%** of the city's projected population
- This represents **20** times its fair share; that's irrational!

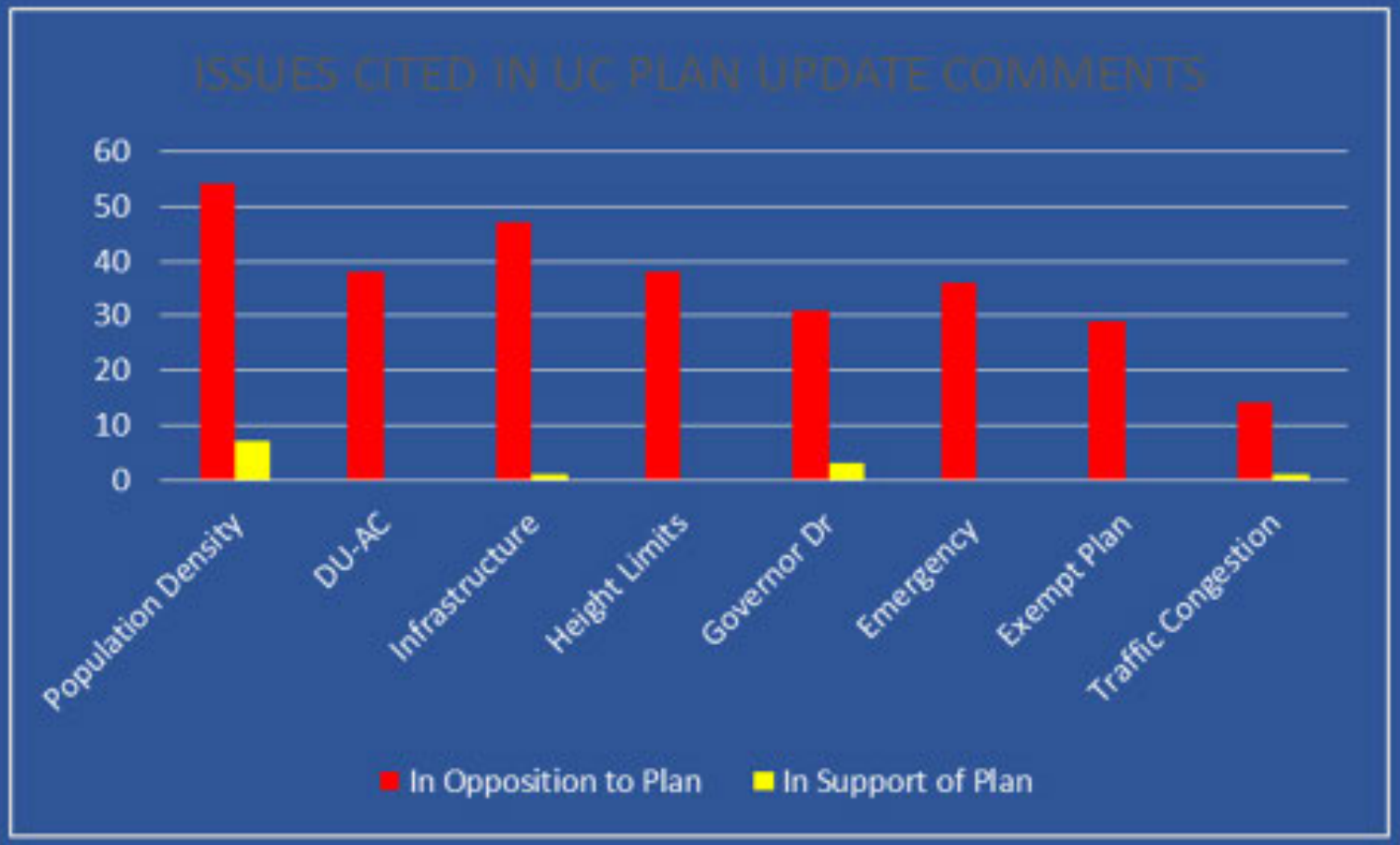
Fact 5: Plan Opponents Outweigh Supporters



Fact 5: Opponents vs Supporters (cont.)



Fact 5: Opponents vs Supporters (cont.)



Fact 6: Road Diet Won't Work for Governor Drive

- Road diets work for select streets; not Governor Drive
- Already congested given **3** schools, **2** parks, **2** aquatic centers, **2** retail centers, **1** recreation center
- Governor Dr. is the only east-west arterial in south UC; would block emergency evacuation and access
- City used outdated, **eight-year-old VMT forecast** from SANDAG's Series 14; current and thorough Traffic Analysis still needed

Fact 7: South UC Plazas Must be in Scale with Neighborhood

- Reduce height limit zoning at Sprouts center to **40** feet and housing density to **0-29** du/ac
- Lower height limit zoning at Vons center to **50** feet and housing density to **0-54** du/ac
- Ensure minimum **30-foot setbacks** and **45-degree-angle** stepping from adjacent residential properties
- Protect community-serving uses; require grocery stores

Fact 8. Residents of South UC Developments Would Still Own Cars

- Sprouts Center not a TPA; Vons center far from trolley
- Maintain current number of commercial parking spaces at Sprouts and Vons centers
- Require residential projects to have **at least one parking space** per dwelling unit
- Revised Plan Update should contain language that *ensures* retail shoppers will have enough free parking

Fact 9. Parks & Recreation Deficit

- As written, Plan would have a **4,000** park point deficit, meaning **40,000** people would be underserved
- Approx. **2.2** recreation center deficit, **0.59** aquatic center deficit
- Planned site on Torrey Pines Road is leased until **2043**, too far from UC, and inaccessible by bike or trolley
- City must meet its own Parks Master Plan guidelines; we fully support UCPG's detailed recommendations

Fact 10: Plan Devoid of any New Fire & Safety Facilities

- UC is surrounded by canyons and vulnerable to wildfires and earthquakes; crime is increasing
- Currently there are **3** fire stations and **2** police stations that serve UC; already have coverage deficit
- Critical that space is designated for new fire and safety facilities *before* population increases; must be shown in Plan Update

Fact 11. UC is Highly Vulnerable to Wildfires & Earthquakes

- **85%** of UC in VHFHSZ; fire agencies warn of high potential for wildfires due to more wet winters to come
- Limited ingress/egress options; traffic grid is insufficient
- These factors are ***deadly*** with increased density and should not be ignored
- UC is also within the active Rose Canyon Fault Zone

Fact 12. UC Plan is Framework for Wrong Type of Housing

- We support more affordable housing, but not more small, high-rise luxury apartments
- Need balanced mix of housing for people at all income levels; larger **3- and 4-bedroom units** for families; more low- and mid-rise housing developments
- *Mandates* vs. "incentives" for multi-bedroom units; must void in-lieu fees as loopholes

Fact 13. More Schools are Needed

- SDUSD stated City Plan requires at least **1** new elementary school near Genesee and La Jolla Village Drive ***before*** any new housing units are built
- City did not disclose District's stated requirements; Plan Update includes **zero** new schools
- City must work with SDUSD and developers to identify funding and location prior to increasing UC population

Fact 14. Complete Communities Program Conflicts with UC Plan Update

- Plan Update could be undermined by the Complete Communities Housing Solutions program and the many other conflicting density incentive programs whose final impact is unknown
- UCPG recommended suspending Complete Communities; we support their recommendation

Fact 15. On Wrong Track with Transit

- Justification for **$2.1 billion** expenditure on trolley extension was to bring workers and students *into* UC from other communities
- With **62** trolley stops, workforce and student housing should be allocated fairly rather than concentrated in UC
- Plan is reliant on *future* funding for transit expansion that's not guaranteed
- People will only give up their cars with a clean, safe, efficient transit system; limitations of current transit mean people still need cars.

Fact 16. Funding Mechanisms Needed for Infrastructure

- City spent **millions** of taxpayer dollars to hire outside consultants to illustrate what UC will look like
- Plan Update doesn't identify funding sources for new infrastructure, public facilities and community enhancements depicted
- Without actual funding mechanisms, the UC Plan Update is merely pretty pictures

In Conclusion

We Support UCPG's Recommendation of
Adopting the Community Preferred Plan Update

The Revised UC Plan Update Should Be Approved
After the Final PEIR is Completed

THANK YOU ~ *UC PEEPS*

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 5:07:20 PM

Submitted on Wed, 06/12/2024 - 17:07

Submitted values are:
Contact Info

Name:: Ruth Bush
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: ITEM-6

Comments::
I live in West University City.

I support the UCPG recommended changes to the Draft University Community Plan Update, including:

Lower density maximums per site of 145 dwellings per acre;

Reduction of the City's proposed 100' height limit at South UC shopping centers to 40' at Sprout's center and 50' at Vons center, in line with what the City consistently showed for years in their presentations to the public;

Stronger policies to protect, enhance, and enjoy the natural environment and to integrate nature throughout the Plan Area;

Requirement that new residential developments and mixed-use (commercial and residential on same site) provide public spaces and recreational opportunities (the City required this in a previous draft of the plan but has now made it optional due to opposition by developers)

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42413

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www.smwlaw.com

KRISTI T. BASCOM, AICP
Urban Planner
KBascom@smwlaw.com

June 12, 2024

Via Electronic Mail Only

Land Use and Housing Committee
City of San Diego
E-Mail: CouncilCommittee@sandiego.gov
Copy to: planuniversity@sandiego.gov

Re: 6/13/2024 Agenda Item #6: University Community Plan Update

Dear Chair Lee, Vice Chair Lacava, Councilmember Whitburn, and Councilmember Moreno:

This firm represents Friends of Rose Canyon in matters related to the University Community Plan and Local Coastal Plan Update ("UCP/LCP Update" or "UCP") and the adoption of Blueprint San Diego, the City's General Plan Update. This firm submitted detailed comments on the March 2024 Draft UCP, the Draft Blueprint San Diego General Plan Update ("Blueprint SD") and the Draft Program EIR for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update ("Draft PEIR"), all letters dated April 29, 2024. Additionally, we submitted comments to the Planning Commission for their consideration of the above items at their public hearing on May 30, 2024.

Friends of Rose Canyon's main concern has been removing prematurely-planned trails in Rose Canyon Open Space Park and other sensitive habitat areas within MHPA lands from all maps and exhibits in the UCP. Thankfully, this adjustment to the UCP been made. However, there are other needed revisions we'd like to draw the Committee's attention to as the City approaches final adoption of the UCP. These revisions are enumerated in the attached letter dated May 30, 2024.

One revision is particularly important, and it is aligned with the City's action to remove prematurely-planned trails from UCP maps and exhibits. Table 7 in the May 2024 UCP (pages 210-211) identifies Rose Canyon Open Space Park as one of the City's Regional Parks and Open Space facilities. Table 7 correctly notes that "The future Citywide Trails Master Plan will comprehensively plan trail and open space park planning that complies

with MSCP consistency findings, Environmentally Sensitive Land regulations, and Natural Resource Management Plans before being formally proposed for City evaluation and funding (see Parks Master Plan policies PP10, CSR25 and RP5)." However, Table 7 goes on to include a recommendation to "Design and construct trails that comply with the MSCP consistency findings, Environmentally Sensitive Land regulations, and Natural Resource Management Plans." Since it has not been determined ***if*** new trails in Rose Canyon can be consistent with the MSCP, it is premature to include a recommendation to ***design and construct*** new trails in Rose Canyon Open Space Park.

The concern with the current Table 7 language is that, despite the City's intention to comprehensively evaluate new and appropriate trail locations through the preparation of a Citywide Trails Master Plan that will include thorough environmental review, the language to "design and construct" trails in Rose Canyon is very prescriptive. After the Final UCP is adopted, this language could be interpreted to mean that trails have been cleared to be designed and constructed when, in fact, they have not. At this stage – before the adoption of a Citywide Trails Master Plan and before the adoption of a Natural Resource Management Plan for Rose Canyon – it is more appropriate for the language in Table 7 to read: "Close informal trails located in areas inconsistent with the MSCP. Conduct a biological resource evaluation, identify area-specific management directives (such as a Natural Resource Management Plan), and prepare a comprehensive plan for trail location and management in Rose Canyon. The comprehensive plan should include closing and enforcement on informal trails and completing adequate environmental review to ensure that any new proposed trail alignment is consistent with the MSCP."

The process to draft, refine, and come to a recommendation on the UCP has been a multi-year process with stakeholders across the spectrum. Friends of Rose Canyon appreciates the City's attention to the importance of preserving the sensitive resources in the UCP area and for removing prematurely-identified trails from the Plan's maps and exhibits. However, there are still important revisions to make to the Plan, as noted herein and our May 30, 2024 letter to the Planning Commission (attached). We urge the Land Use and Housing Committee to forward a Final UCP that addresses these remaining community concerns.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Kristi T. Bascom, AICP

cc: Deborah Knight, Executive Director, Friends of Rose Canyon (via email)
Heather M. Minner, Partner, Shute, Mihaly, & Weinberger, LLP

Attachments:

1. May 30, 2024 SMW/Friends of Rose Canyon letter to the San Diego Planning Commission

1792092.1

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May 30, 2024

Via Electronic Mail Only

Planning Commission
City of San Diego
E-Mail: planningcommission@sandiego.gov
Copy to: planuniversity@sandiego.gov

Re: 5/30/2024 Planning Commission hearing Item #3: University Community Plan Update

Dear Planning Commission:

This firm represents Friends of Rose Canyon in matters related to the University Community Plan and Local Coastal Plan Update ("UCP/LCP Update" or "UCP") and the adoption of Blueprint San Diego, the City's General Plan Update. This firm submitted detailed comments on the March 2024 Draft UCP, the Draft Blueprint San Diego General Plan Update ("Blueprint SD") and the Draft Program EIR for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update ("Draft PEIR"), all letters dated April 29, 2024.

In the comments submitted on the Draft UCP, Friends of Rose Canyon expressed concern about several aspects of the Plan, including:

- The premature identification of new trails in Rose Canyon Open Space Park and other sensitive habitat areas within MHPA lands;
- The need for amendments to policy language to better reflect the need to address MSCP and MHPA requirements;
- Impacts to sensitive habitat areas from future canyon-adjacent development resulting from the removal of policy language that was in the Discussion Draft UCP. The previous version of the Draft UCP required a 50' setback, building transitions of 45 degrees, locating the long end of the building away from the canyon rim, and avoiding reflective glass facing the canyon.

- Lack of policy commitments or plans related to management, monitoring and enforcement of activities in MSCP lands in order to prevent further habitat damage; and
- Ensuring accurate rezoning for all parcels that should be in the MHPA.

How these comments were (or were not) addressed in the Final UCP are summarized below, and comments related to the Planning Commission review and consideration of the Final UCP and Final PEIR are included as well. We urge the Planning Commission and City Council to adopt a Final UCP that includes edits to address these remaining concerns:

I. Identification of Specific New Trails in Rose Canyon and MSCP Lands Were Removed from the UCP, but Language Still Remains in the Plan to "Design and Construct" New Trails.

Thankfully, the May 2024 Draft UCP removed new trails in Rose Canyon Open Space Park and other sensitive habitat areas within MHPA lands, recognizing that the City must complete a Natural Resources Management Plan for Rose Canyon, as required by the MSCP, and adopt a Citywide Trails Master Plan before proposing new trails in MSCP lands.

Table 7 in the Draft UCP (pages 212-213) identifies Rose Canyon Open Space Park as one of the City's Regional Parks and Open Space facilities. Table 7 correctly notes that "The future Citywide Trails Master Plan will comprehensively plan trail and open space park planning that complies with MSCP consistency findings, Environmentally Sensitive Land regulations, and Natural Resource Management Plans before being formally proposed for City evaluation and funding (see Parks Master Plan policies PP10, CSR25 and RP5)." However, it goes on to include a recommendation to "Design and construct trails that comply with the MSCP consistency findings, Environmentally Sensitive Land regulations, and Natural Resource Management Plans." Since it has not been determined if new trails in Rose Canyon can be consistent with the MSCP, it is premature to include a recommendation to ***design and construct*** new trails in Rose Canyon Open Space Park. Instead, the recommendation for Rose Canyon should focus on improving the existing conditions of the MHPA lands and enforcement to protect the existing habitat from further damage. The recommendation should also address closing existing informal trails through MHPA lands.

Furthermore, the table should not include a "Proposed Recreational Value", which suggests that additional facilities are forthcoming. As described above, that is not yet

known. Regardless, the Draft PEIR that covers the Draft UCP Update notes that value standards are not intended to be applied to open space parks such as Rose Canyon. *See* Draft PEIR p. 4.13-5.

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

To reflect these MSCP requirements, text on following pages of the Draft UCP should be amended:

- Page 124: "Open Space Canyons are City-owned lands located throughout the City, consisting of canyons, mesas, and other landforms. Most of the open space canyons are MSCP habitat preserves and have specific conditions for public access and type of use. This open space is intended to preserve and protect native plants and animals, while providing for compatible public access and enjoyment."
- Page 141: "[T]he approximately 8,676-acre University community area supports a variety of vegetation communities and land cover types in its open space including both upland and wetland vegetation communities. The majority of these open space areas are subject to compliance with the City's MSCP Subarea Plan where ~~preservation balances the protection of~~ natural resources must be preserved, with the allowance of public passive recreation only where compatible with that mandate."

A. SANDAG's Antiquated Bike Network Trail Should be Removed from the UCP. The City Council specifically removed it from the City's Bicycle Master Plan Update in 2013. It has been superseded by the City's Gilman Dr. Coastal Rail Trail (CRT) project.

UCP Figure 20 (Bicycle Network Map) contains an outdated reference to a previous alignment of the Coastal Rail Trail (CRT). Attachment 1 is Figure 3-3 from SANDAG's 2021 Regional Plan, which incorrectly notes the CRT alignment on the north side of Rose Canyon (Trail ID #11) instead of identifying the "Gilman Connector" (Trail ID #17) as the official CRT alignment. This is an old alignment for the Coastal Rail Trail (CRT) project was proposed by SANDAG over 20 years ago. This alignment was later rejected by the City in 2013 when the City Council voted unanimously to remove the Rose Canyon and Roselle Canyon from the 2012 Bike Master Plan Update. (See Attachment

2, City Council Resolution 308597, approved unanimously, including by then Councilmember and Interim Mayor Todd Gloria).

In 2015, the City chose Gilman Dr as the alignment for the CRT in accordance with the process identified for each city to "plan, design and construct segments of the trail within their respective jurisdictions."[1] The City has since completed final design and environmental review of the CRT project, and has partially funded construction. The Draft UCP correctly shows the Gilman Drive alignment of the Coastal Rail Trail on pages 90-91, so the old SANDAG proposed alignment through Rose Canyon and Roselle Canyon included on Figure 20 should be removed. This is especially important since much of the old Rose Canyon and Roselle Canyon alignment is through MSCP habitat, including critical habitat for Spreading navarretia as shown in the Impacted Listed Plant Species table in the 2021 Regional Plan.

II. New and Amended Draft Policies

In addition to removing proposed trails from the exhibits throughout the UCP, there are also additional language and policy considerations that should be addressed in the UCP. We provided these comments on the March 2024 Draft UCP, but changes were not made to the Final UCP. The suggested policy changes include:

A. Proposed New Policies Related to Trails

The following policies should be added to the Draft UCP to make it clear that the City intends to follow its own guidance related to considering new trails:

- "New and formalized trails for passive recreation in Rose Canyon and other MSCP lands will only be considered after sustained habitat conservation and MHPA/MCSP compliance is demonstrated. New trails will be located and designed so as not interfere with the primary purpose of Rose Canyon and other MSCP lands as open space for the preservation of sensitive habitat areas."

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

[1] Coastal Rail Trail information on City of San Diego website: https://www.sandiego.gov/cip/projectinfo/featuredprojects/railtrail

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

  Background: The existing trails within Rose Canyon and other MSCP lands experience constant degradation and the construction of new, illegal trails for mountain-biking that are damaging and destroying sensitive resources. The City's Open Space Division is so underfunded, there is very limited monitoring of illegal uses or enforcement within the MHPA boundaries to prevent habitat damage and impacts to wildlife, even as those impacts have greatly increased. The MSCP Subarea Plan states that "[W]here land is preserved as part of the MSCP through acquisition, regulation, mitigation or other means, management is necessary to continue to ensure that the biological values are maintained over time, and that the species and habitats that have been set aside are adequately protected and remain viable. The City will be responsible for and will continue the management and maintenance of its existing public lands (including those with conservation easement), at current levels. The City will also manage and maintain lands obtained as mitigation where those lands have been dedicated to the City in fee title or easement, and land acquired with regional funds within the City's MHPA boundaries." *See* MSCP Subarea Plan at 49. Furthermore, the MCSP Subarea Plan lists the following as one of the General Management Directives: "Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/maintenance as needed." *See* MSCP Subarea Plan at 52. Open space park resources for monitoring and enforcement and habitat protection in Rose Canyon are far below what is needed.

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

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

sensitivity in those locations." *See* MSCP Subarea Plan at 52. This proposed UCP policy reiterates and restates anew this important guidance.

B. Proposed Revisions to Policies Related to Trails

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

- Policy 2.9C: Developments that are adjacent to MHPA lands or other natural open space must provide signage that informs people of the location of official access points for trails and that clearly prohibits unauthorized access into the adjacent open space. Signs should also provide information about the local native plant and animal species and that San Diego is a biodiversity hot spot. ~~Where possible and permitted by governing codes and regulations, developments that are adjacent to natural open space should provide multi-use trails for hiking, bicycling, jogging, and other uses so that residents can access and appreciate the open space.~~
- Policy 2.9D: Orient the narrow end of buildings toward the open space. ~~Encourage design strategies to maximize views from development to open spaces, such as orienting buildings to open space areas and/or locating common amenity areas adjacent to public open space~~. For MHPA adjacent development, common amenities that involve outdoor lighting and potential noise should ~~consider being~~be located away from the open space or other MHPA edge. Common amenities that involve outdoor lighting and potential noise ~~can also consider being~~shall be located on the other side of buildings to avoid the open space or MHPA edge.
- Policy 2.9E: For buildings that are adjacent to open space and MHPA areas, ~~promote~~ require design strategies that reduce the potential for bird strikes.
- Policy 3.1G: Enhance pedestrian and bicycle access to ~~open space lands, natural recreational areas, and~~ developed parks by improving connectivity and increasing awareness of ~~trails and other~~ pedestrian pathways and on-street bike routes as complementary components of the community's circulation network via signage, wayfinding programs, and educational kiosks. *(Note: Reason for this change: The MSCP does not recognize being part of a circulation network as a purpose for*

trails – their primary purpose is habitat protection with passive recreation "conditionally compatible".)

- Policy 3.3A: Provide a continuous bicycle network of safe, convenient, and attractive bikeways on streets and through developed areas throughout the University Community, with an emphasis on low stress connections between the southern neighborhoods and destinations in the northern portion of the community, as well as to schools, parks, mixed-use and employment villages, commercial centers, transit stations and mobility hubs.
- Policy 3.3C: Support a comprehensive network by implementing bikeways that facilitate interconnectivity with the UC San Diego's bicycle network, the regional bicycle network, and on-street bike routes to ~~trails, and~~ other communities. *(Note: MSCP lands are not part of the regional bicycle network.)*
- Policy 4.1C: Establish an integrated public realm framework of connected sidewalks, urban pathways, ~~trails,~~ paseos, plazas, connections at multimodal mobility hubs, and parks like linear and pocket parks.
- Policy 4.1K: Provide open space linkages in compliance with MHPA goals and policies~~where appropriate~~, including trailheads for bike and pedestrian access with appropriate, visible, and clearly marked entrances and regulations.~~.~~
- Policy 4.1T: Promote a coordinated design theme for the University Community throughout different neighborhoods. For example, create a consistent trailhead marker with similar text, logo and resource materials. MSCP rules and regulations should be included at trailheads into MHPA lands.
- Policy 4.2A: Promote open space conservation of natural lands~~,~~. P~~and p~~rovide open ~~space linkages where appropriate~~, overlooks, trail heads and bike/pedestrian access with appropriate, visible, and clearly-marked entrances where appropriate and in conformance with MCSP and MHPA guidelines.
- Policy 4.2C: Through the Citywide Trails Master Plan process, examine locations where neighborhoods and communities can be connected to adjacent parks and trails (if in conformance with MCSP and MHPA guidelines).~~Connect adjacent communities to trails and trail adjacent parks by extending existing trails or providing new ones.~~
- ~~Policy 4.2E: Re-vegetate graded slopes adjacent to natural hillsides and canyons with native, drought tolerant, and fire resistive species to improve drainage conditions, reduce slope erosion and instability, and restore biological diversity.~~

(Note: Future Natural Resource Management Plan(s) will determine best practices – this language is premature in the UCP.)

- Policy 5.1A: Promote open space conservation of natural lands and provide open space linkages ~~(where appropriate)~~, trailheads and bike/pedestrian access with clearly marked entrances where appropriate and in conformance with MCSP and MHPA guidelines.
- Policy 5.1B: Connect open space trails with major canyons, neighborhood parks, schools and private open space areas where feasible and where appropriate and in conformance with MCSP and MHPA guidelines. The proposed trail system is illustrated in Figure 27.
- Policy 5.1C: Provide opportunities for public access to open space, including portions of the MHPA, through low impact recreation, scenic overlooks, environmental education and research where appropriate and in conformance with MCSP and MHPA guidelines.
- ~~Policy 5.1E: Connect adjacent communities to trails and trail adjacent parks by extending existing trails or providing new ones~~ *(Note: Suggest deleting – repetitive and same as Policy 4.2C)*
- Policy 5.2B: ~~Support minimizing~~Minimize the visual, noise, and lighting-related impacts of new development to canyons.
- Policy 5.2C: ~~Minimize and evaluate the use of~~Require that night lighting along the canyons and adjacent to sensitive habitat areas be ~~,~~ consistent with MHPA Adjacency Guidelines, ESL regulations, and Outdoor Lighting regulations. Lights should be full shielded and directed away from the MHPA.
- ~~Policy 5.13I: Consider the topography, vegetation and scenic value of Rose Canyon for future uses. Passive recreational uses are recommended rather than active uses requiring major grading and construction. Protect and restore Rose Canyon Open Space Park for education, research, stewardship, and passive recreation.~~ *(Note: Suggest deleting – adds no value and "for future uses" is confusing.)*
- ~~Policy 5.13J: Pursue an open space easement with access along the north side of the AT & SF Railroad between I-5 and I-805.~~ *(Note: Suggest deleting – most of the land is either railroad right of way or on private property and infeasible.)*

C. Policies Related to Canyon-Adjacent Setbacks and Building Transitions

The Community Discussion Draft of the UCP published in April 2023 contained more appropriate language to guide canyon-adjacent building design. Page 48 in the Discussion Draft UCP stated: "Development *should* recognize the value of this open space to both support habitat and wildlife and serve as a community resource. This can be accomplished by designing site improvements to minimize development's impact to the open space and to steep hillside areas (see Figure 10). *Buildings adjacent to and facing canyons in the community should step back from the canyon edge with terraces and upper story stepbacks. Wherever possible, the long side of the building should face inward and away from the canyon open space.* Reflective glazing that produces glare and light onto the canyon should be avoided, and *buildings should be articulated* with a pattern of forms and massing that provides a diverse and varied façade along the open space edge. Public access to open space should be maintained with paseos, paths, terraces, and other openings in the development along the canyon edge." (italics added for emphasis). Figure 10 in the Discussion Draft UCP (Canyon-Adjacent Building Design) identifies that buildings should be set back a minimum of 50' from the canyon rim, that the tallest portion of the building should be further from the canyon rim, and that the building should provide upper story setbacks.

However, the Draft UCP backslides and removes all standards, instead providing permissive language in the text and as notes to Figure 11 (Canyon-Adjacent Building Design): Page 56 of the Draft UCP states "*Development is best when* it is designed to recognize the value of open space in supporting habitat and wildlife and serving as a community resource. This *can be accomplished by* designing site improvements to minimize the impact of development to open space and to steep hillside areas. The Community Plan *envisons* development adjacent to and/or face canyon open space areas with buildings that locates the tallest portion of buildings furthest from the canyon rim, incorporates a setback from the canyon edges, and steps back upper story levels as illustrated in Figure 11. Building facades with varied design features *can help to minimize* the potentiate for bird strikes. Outdoor lighting that is shielded, directed downward, and faced away from canyon edges *can help to reduce* reflective glazing that produces glare and light onto the canyon. Development with paseos, paths, terraces along the canyon edge *has the opportunity to* provide public access and views points to open space." (italics added for emphasis). In addition to the shift from prescriptive language to permissive language, reference to building orientation along the canyon rim and having the long side face away from the canyon has been removed. Furthermore, Figure 11 has been amended to remove all "shoulds" and it now the notes simply state observations of the building illustrated, how it is setback from the canyon rim, how the upper story is set back, and how the tallest portion of the building depicted is located furthest away from

the canyon rim. The text and Figure 11 do not require anything, they simply acknowledge a number of design elements that could be incorporated.

This is poor policy all around that does not reflect current City policy contained in the supplemental development regulations identified in the Draft UCP (starting on page 187). The setback requirement should be restated and the requirement for a gradual building transition should be reinstated as well. Policies with flexible language such as "encourage", "promote", and "where possible", occasionally have their place, but this is not one. The text on page 56 of the May 2024 Draft UCP and on Figure 11 should be revised to revert to the text and Figure 10 from the Discussion Draft UCP published in April 2023. Additionally, Figure 35 (Community Plan Implementation Overlay Zone) should be updated to reflect that Canyon-Adjacent Supplement Development Regulations should apply to all properties adjacent to Rose Canyon.

The Discussion Draft included a section of Area-Specific Supplemental Design Regulations that were removed from the Draft UCP and should be added back in:

Canyon-Adjacent Development

The purpose and intent of these supplemental development regulations are to provide design regulations to lessen the effect of buildings developed adjacent to open space areas designated in this community plan.

SDR-21 Building Design abutting Open Space: Development on sites directly abutting an open space area designated in this community plan shall conform with the following requirements:

a) For a premises greater than 300-feet in depth from the street, provide a 50-foot building setback from the open space area.

b) Provide a 15-foot upper story stepback at least 50 feet above the ground level for the portion of the building fronting the open space area.

c) Orient the short ends of buildings toward the open space areas or break down the length of façades facing the open space areas with articulation in the form of one 4-foot offset in the building plane for every 50 feet of façade length.

d) The use of highly reflective and mirrored glazing is not permitted fronting open space areas.

Furthermore, the policies below should be modified:

- Policy 2.9A: Encourage context-sensitive design by stepping back from the canyon edge and orienting the short end(s) of building(s) perpendicular to the canyon edge. Context-sensitive design shall incorporate the setback, step-back, and building height transition requirements of Canyon-Adjacent Supplement Development Regulations including SDR -C.2 and SDR-21 (or as appropriately renumbered once added back into the Draft UCP).
- Policy 2.9B: ~~Promote design strategies that reduce light and glare on building frontages facing canyons and open space.~~ Design buildings to eliminate light and glare on building frontages facing canyons and open space.
- Policy 2.9E: For buildings that are adjacent to open space and MHPA areas, ~~promote~~ require design strategies that reduce the potential for bird strikes.

III. Zoning and Graphic Inconsistencies On Properties in the UCP Area That Should be Remedied

The zoning districts for the following properties in the UCP boundary should be corrected to accurately reflect the actual uses and land use designations as well as to protect open space MSCP lands in the UCP area. Through implementation of the adopted University Community Plan, the zoning corrections should be made as follows:

Towne Centre Drive – Roselle Canyon – Sorrento Headlands area.

The zoning at the north end of Towne Centre Drive should be updated to reflect existing conservation agreements and conditions on the city owned MSCP lands in this area. This parcel is incorrectly shown in the IP 1-1 (Prime Industrial) zone. Zoning should be corrected from IP1-1 to OP 2-1 or OC 1-1 on the 5-acre, city owned conservation/MSCP parcel (APN: 343-121-38), which is situated just north of Towne Centre Drive. This parcel was specifically deeded to the city in 1998 with a conservation deed "to be preserved as permanent open space in the city's MHPA" (see R-290280, 6/16/98, p 4) as part of the approval of the Eastgate Acres project. It has been 100% conserved in the MHPA since 1998, and its zoning should reflect this status.

"Pueblo Lands Central and South"), managed by the Public Utilities Department.

The current zoning for these lands today is RS 1-14, which is not accurate, but which has helped to maintain them in undeveloped open space. The Draft UCP proposes to zone

these two parcels IL-2-1 (Light industrial). The proposed zoning for these parcels should be OC 1-1, OP 2-1, or AR in recognition of their critical environmental status. Pueblo Lands "central" (north of Nobel Dr) and "south" (south of Nobel Dr) comprise 71 acres of environmentally sensitive, city-owned land between I-805 and sensitive habitat areas in MCAS Miramar. They include two city-owned parcels in mixed conservation status managed by the Public Utilities Department. The largest part of these parcels in the MCAS Airport Transition Zone, which limits development potential due to crash safety potential. The Pueblo Lands Central parcel (north of Nobel) is shown in Data Basin as 100% conserved MHPA land. IL 2-1 Zoning for Pueblo lands central (north of Nobel Dr), in particular, is not consistent with this MSCP status. The Pueblo Lands South parcel (south of Nobel Drive) is also being used for habitat mitigation and grassland restoration in mitigation for the PURE Water project. The parcels comprise critical links in the MSCP identified wildlife corridor connecting habitat cores in Rose Canyon OS Park, MCAS-Miramar, and Mission Trails Regional Park with lands connected to the Penasquitos watershed.- Open Space zoning for the parcels would be consistent with the proposed Land Use Designations for these parcels, shown on page 33 of the Draft UCP, and consistent with UCP Policy 5.13G: "Retain the areas influenced by MCAS Miramar activities as open space per the existing fee ownership of the Federal Government in the interest of public health, safety and welfare."

Need to correct the location of MSCP Core Biological Resource Area Corridor.

Figure 29 incorrectly identifies the MSCP Core Biological Resource Area Corridor running north/south on the wrong side of I-805. It should be on the east side of I-805, where there is open space (the west side is developed). This is important – especially in combination with rezoning the "Pueblo lands Central and South" east of I-805 that comprise this wildlife corridor to Open Space.

IV. The UCP Suddenly Includes Widening Genesee Ave From Four to Six Lanes.

UCP Appendix Table 5, Planned Street Classification Modifications, was modified between the Draft UCP (published in March 2024) and the May 2024 UCP to identify Genesee Avenue as a six-lane prime arterial. This would involve widening Genesee Ave from Nobel Drive to the SR 52 interchange and increasing the street from a four-lane to six-lane road along its length, a portion of which crosses Rose Canyon. However, the UCP offers no additional information on how this widening would be accommodated – in particular the part of Genesee that bridges Rose Canyon. In 2015, the City completed a full EIR to remove a previously-conceptualized bridge and widening of Genesee Ave.

from the UCP. At that time, City staff informed the City Council explicitly that removing the bridge and widening was the first step in updating the UCP. This proposed change to Table 5 of the UCP to include widening Genesee to six lanes between Nobel and SR-52 must absolutely be removed.

V. Planning Commission Action on the UCP and Final PEIR

One of the actions identified for Planning Commission consideration on May 30, 2024 includes recommending certification of Program Environmental Impact Report (SCH No. 2021070359) prepared for the proposed comprehensive update to the UCP. However, the Final PEIR has not yet been published, is not available for public review, and is not available for Planning Commission review and consideration. A Final EIR is made up of a Draft EIR (in this case, published in March 2024) plus the Response to Comments, any errata, and any supplemental information determined to be needed by the comments received on the DEIR. In the case of the UCP (and larger Blueprint San Diego), only the Draft EIR portion of the Final EIR exists – none of the other components of the Final EIR are yet available. The Planning Commission cannot review the Response to Comments, any supplemental information, or any modifications to the DEIR that will be forthcoming and yet is still recommending certification of this document. It is poor policy for the Planning Commission to be in the position to recommend certification of an EIR it has never seen.

VI. Conclusion.

The process to draft, refine, and come to a recommendation on the UCP has been a multi-year process with stakeholders across the spectrum. Friends of Rose Canyon appreciates the City's attention to the importance of preserving the sensitive resources in the UCP area and for removing prematurely-identified trails from the Plan's maps and exhibits. However, there are still key issues that require further amendments to the Plan. We urge the Planning Commission, and ultimately, the City Council, to adopt a UCP that addresses the comments contained in this letter.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Kristi Bascom

Kristi T. Bascom, AICP

cc: Deborah Knight, Executive Director, Friends of Rose Canyon (via email)
Heather M. Minner, Partner, Shute, Mihaly, & Weinberger, LLP

Attachments:

1. SANDAG 2021 Regional Plan Figure 3-3 – Regional Bicycle Network
2. City Council Resolution 308597

1776087.1

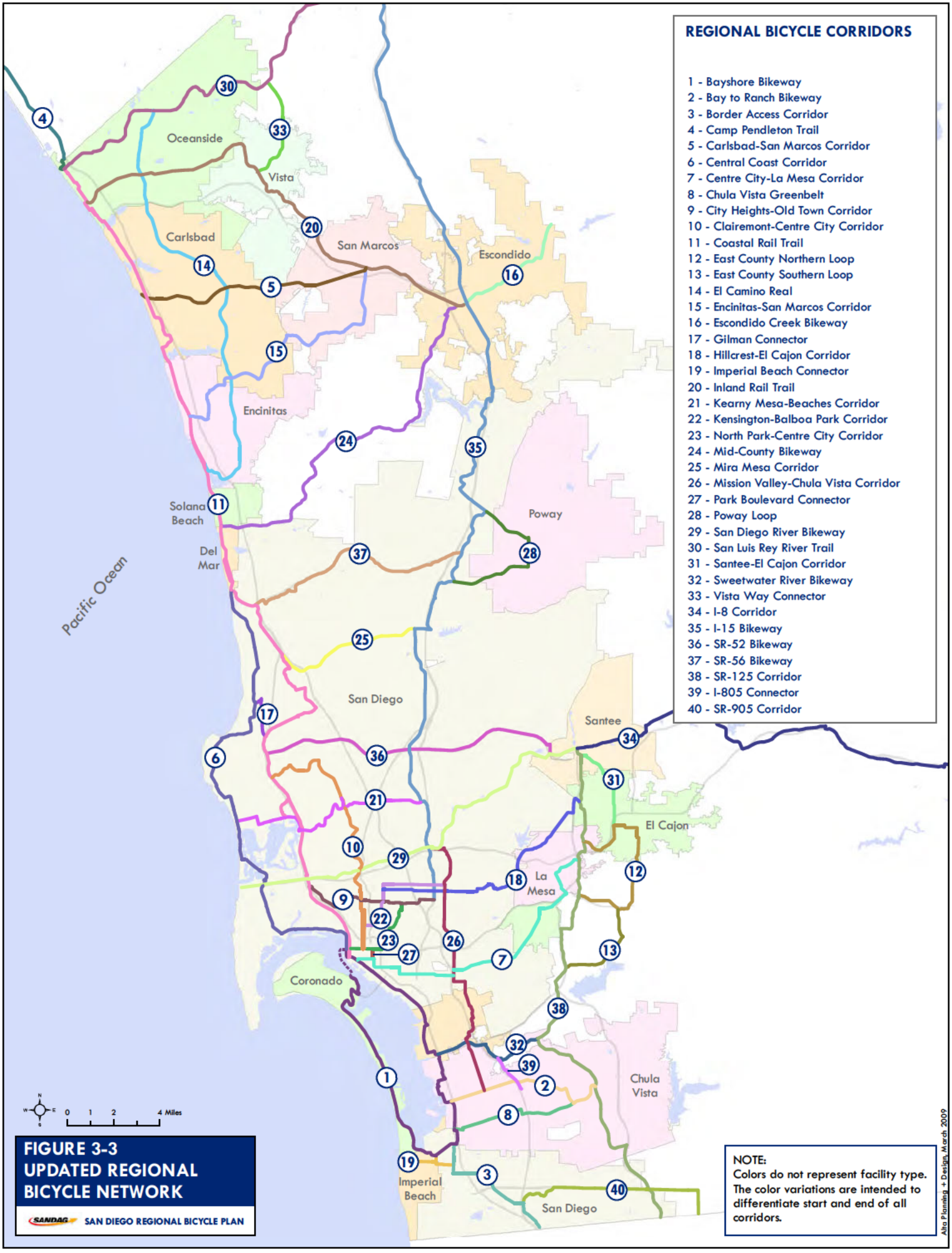

FIGURE 3-3
UPDATED REGIONAL BICYCLE NETWORK

SANDAG SAN DIEGO REGIONAL BICYCLE PLAN

#207

(R-2014-137) #B
REVISED COPY

RESOLUTION NUMBER R- 308597

DATE OF FINAL PASSAGE DEC 26 2013

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO ADOPTING THE CITY OF SAN DIEGO BICYCLE MASTER PLAN UPDATE.

WHEREAS, on May 28, 2002, the City Council of the City of San Diego approved Resolution No. R-296581, adopting the City of San Diego's Bicycle Master Plan; and

WHEREAS, the City of San Diego Bicycle Master Plan Update provides direction for expanding the existing bikeway network, connecting gaps, providing for improved local and regional connectivity, and encouraging bicycling as a transportation mode; and

WHEREAS, on July 25, 2013, the Planning Commission of the City of San Diego considered the City of San Diego Bicycle Master Plan Update, and pursuant to Planning Commission Resolution No. 4535-PC, the Planning Commission voted to recommend City Council adopt the City of San Diego Bicycle Master Plan Update, certify the Environmental Impact Report No. 290781 and adopt the Findings, Statement of Overriding Considerations and Mitigation, Monitoring and Reporting Program No. 290781. In addition, the Planning Commission recommended that the Findings of Fact and Statement of Overriding Considerations be revised to include additional language to balance vehicular level of service goals with bicycle network expansion goals, and include complete streets language in the project benefits; and

WHEREAS, on December 9, 2013, the City Council of the City of San Diego held a public hearing for the purpose of considering the adoption of the City of San Diego Bicycle Master Plan Update; NOW, THEREFORE,

BE IT RESOLVED, by the City Council of the City of San Diego, that the Council adopts the City of San Diego Bicycle Master Plan Update as amended to remove the Rose Canyon and Roselle Canyon segments, a copy of which is on file in the office of the City Clerk as Document No. RR- 308597.

BE IT FURTHER RESOLVED, that the City Attorney's Office and staff are directed to come back within 30 days with appropriate language regarding a proposed bicycle advisory committee.

APPROVED: JAN I. GOLDSMITH, City Attorney

By _____
Corrine L. Neuffer
Deputy City Attorney

CLN:dr:als
11/21/13
12/11/13 Revised
Or.Dept:DSD
Doc. No. 631945_2

I hereby certify that the foregoing Resolution was passed by the Council of the City of San Diego, at this meeting of DEC 09 2013.

ELIZABETH S. MALAND
City Clerk

By _____
Deputy City Clerk

Approved pursuant to Charter section 265(i):

_____ _____
(date) TODD GLORIA, Council President

Passed by the Council of The City of San Diego on DEC 09 2013, by the following vote:

Councilmembers	Yeas	Nays	Not Present	Recused
Sherri Lightner	☑	☐	☐	☐
Kevin Faulconer	☑	☐	☐	☐
Todd Gloria	☑	☐	☐	☐
Myrtle Cole	☑	☐	☐	☐
Mark Kersey	☑	☐	☐	☐
Lorie Zapf	☑	☐	☐	☐
Scott Sherman	☑	☐	☐	☐
David Alvarez	☑	☐	☐	☐
Marti Emerald	☑	☐	☐	☐

Date of final passage DEC 26 2013.

(Please note: When a resolution is approved by the Council President as interim Mayor, the date of final passage is the date the approved resolution was returned to the Office of the City Clerk.)

AUTHENTICATED BY:

TODD GLORIA, COUNCIL PRESIDENT
as interim Mayor of The City of San Diego, California.

(Seal)

ELIZABETH S. MALAND
City Clerk of The City of San Diego, California.

By _____, Deputy

Office of the City Clerk, San Diego, California

Resolution Number R- 308597

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 5:16:08 PM

Submitted on Wed, 06/12/2024 - 17:16

Submitted values are:
Contact Info

Name:: Charles C. Frasier
Email:: [redacted]
City:: San Diego
State:: ca

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item 6: University City Plan Update

Comments::
I'm strongly opposed to the University Community Plan Update, since it would convert Governor Drive from a 4-lane road to a 2-lane road with continuous buffered bike lanes. This conversion will have an unacceptable California Environmental Quality Act (CEQA) transportation impact according to the San Diego Planning Commision's Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report of the Environmental Impact Report (EIR) of the University City Community Plan Update dated March 2024.

Table 7-4 of Appendix A of the Mobility Report shows the Existing Conditions analysis. Governor Drive is found to have an acceptable Level of Service (LOS) rating of B. Table 3-11 of the report shows the Proposed Plan Conditions Analysis. Governor Drive is found to have an unacceptable LOS rating of F.

Because the analysis assumes that there will be no growth in single occupancy vehicles from existing conditions to the University CPU plan conditions, the results of the plan analysis are applicable to the existing conditions if Governor Drive were, tomorrow, suddenly converted from a 4-lane road to a 2-lane
road with continuous buffered bike lanes.

Also, Governor Drive must remain four lanes, so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42415

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 9:27:24 AM

Submitted on Thu, 06/13/2024 - 09:27

Submitted values are:
Contact Info

Name:: Gina Varela
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
A public school employee for 29 years, I rent in District 7. The University Community Plan Update is an important one for the San Diego community and I strongly support this proposed measure. As San Diegans, we deserve expanded housing options to allow us to better access the city for work and leisure. Additionally, the city's climate change goals can be achieved through this measure by allowing wider public transportaiton options.
Pleasure consider that adding 28,000 new homes in a high-opportunity transit-rich area will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.
I've seen the need for more housing and transportation options in this area. [Add 1-2 sentence personal anecdote].
Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42494

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 9:20:30 AM

Submitted on Thu, 06/13/2024 - 09:20

Submitted values are:
Contact Info

Name:: Nancy Beck
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.
The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42493

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 9:10:41 AM

Submitted on Thu, 06/13/2024 - 09:10

Submitted values are:
Contact Info

Name:: Constance Rawlins
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item 6: University City Plan Update

Comments::
Dear Mayor and Councilmembers:

Yet again I'm writing to ask you to listen to what residents want for our own communities. So far, you clearly you have nothing but contempt for a great number of San Diego citizens. What now is called "nimby", used to be called Grass Roots activism.

But because this is so important, I again ask for at least somewhat reasonable development so that our city remains America's Finest City and support the UCPG recommended changes to the Draft University Community Plan Update. Please listen to the residents of University City. I am a lifelong Democrat, & am finding that the Democrats are passing laws that make our cities unliveable...

Sincerely,

Constance Rawlins
Resident of University City

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42490

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 8:49:38 AM

Submitted on Thu, 06/13/2024 - 08:49

Submitted values are:
Contact Info

Name:: Sam Mazzeo
Email: [redacted]
City:: SAN DIEGO
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
As a Renter in District 2 and business owner in District 8, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.
By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.
I've seen the need for more housing and transportation options in this area. I personally choose not to have a car and use public transportation. More housing and more public transportation helps me and everyone else. Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42484

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 8:06:03 AM

Submitted on Thu, 06/13/2024 - 08:05

Submitted values are:
Contact Info

Name:: Ashley Marlow
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: #6

Comments::
Hello,
I live in La Jolla Colony, in UTC. I am writing to express concerns about the City's Draft of the University Community Plan Update. While I am not opposed to building more housing, I am concerned about the increased density in an already busy, high traffic area. It also doesn't seem like the proposed buildings would be affordable, but rather, would be duplicative of other luxury apartments in the area that most people, especially students or recent graduates, would not be able to afford. I am also concerned about how this plan is getting rushed through without proper input from the public - we are the ones who have to live with the results and getting rid of our post office, food stores, and other necessary retail, while making traffic worse, is only going to create unhappy residents. Frankly, observing this process has made me lose faith in my representatives because it seems like the only voices that are being listened to are the ones of the developers. I support the UCPG recommended changes to the Draft University Community Plan Update and hope that you will take them into consideration.
Sincerely,
Ashley Marlow

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42480

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 7:06:57 AM

Submitted on Thu, 06/13/2024 - 07:06

Submitted values are:
Contact Info

Name:: Alan Hamel
Email: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Non-Agenda Comment

Comments::
I urge You to accept and support the UCPG recommended changes to the Draft University Community Plan Update.

Alan Hamel
2933 Gobat Avenue
San Diego, California 92122

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42475

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 5:01:12 AM

Submitted on Thu, 06/13/2024 - 05:01

Submitted values are:
Contact Info

Name:: Jack Beresford
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: UC Plan Update

Comments::
My wife Lucita and I live at 5974 Carnegie Street in University City. We strongly support the UCPG recommended changes to the Draft University Community Draft Plan Update. This includes a lower height limit at the two shopping centers and lower maximum density. We believe these, and other proposed UCPG changes, are a reasonable compromise as the City attempts to create more affordable housing while balancing quality of life for all UC residents. It is unfortunate that City staff has refused to listen to the community most impacted by this plan update. Thank you for taking us into consideration.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42472

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 11:37:59 PM

Submitted on Wed, 06/12/2024 - 23:37

Submitted values are:
Contact Info

Name:: Alexander Pham
Email: [redacted]
City:: La Jolla
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item 6

Comments::
As a renter in District 6, I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. Planning for humans rather than around cars will help make San Diego on a path to a more affordable and sustainable future.

Please approve the University CPU.

Thanks,

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42463

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 11:28:55 PM

Submitted on Wed, 06/12/2024 - 23:28

Submitted values are:
Contact Info

Name:: Marcio de Andrade
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42459

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 10:33:55 PM

Submitted on Wed, 06/12/2024 - 22:33

Submitted values are:
Contact Info

Name:: M Petrie
Email: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 1

Comments::
I live in North University City. I support the UCPG recommended changes to the Draft University Community Plan Update. I also support a height limit and density limit for the La Jolla Colony shopping center that is commensurate with the immediate surrounding residences, which are primarily low density multi-family (townhouses, condos) with 2 stories.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42454

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 10:13:20 PM

Submitted on Wed, 06/12/2024 - 22:13

Submitted values are:
Contact Info

Name:: James Madden
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Land Use & Housing Committee consideration of University City Plan Update Draft

Comments::
I write to suggest that the University City Draft Plan be modified as suggested by the University City Planning Group including
*lower density maximums per site
*larger setbacks and transitions for new buildings adjacent to existing residential & open space
*reduce City's proposed 100' height limit at South UC shopping centers to 40' at Sprout's center and 50' at Vons center
*stronger policies to protect, enhance and enjoy the natural environment and to integrate nature throughout the Plan Area
*requirement that new residential developments and mixed use (commercial and residential on same site) provide public spaces

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42453

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 9:52:11 PM

Submitted on Wed, 06/12/2024 - 21:52

Submitted values are:
Contact Info

Name:: Julie Meier Wright
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I OPPOSE the University City Community Plan Update that doubles housing units and population. The Community Preferred Plan welcomed density up to an already high 22,000 residential units.

Significant information is lacking:

- Transportation/Public Safety: We're in gridlock today. Emergency evacuation from our High-Fire-Risk areas is inadequate. No new fire or police stations are planned. Governor Drive is congested. Traffic analyses are years old. With 62 trolley stations, density should be fairly spread to maximize transit.
- Schools and Parks: The proposed new school's location and funding is unknown. The only new park isn't in the community – or available until 2043!
- Quality of Life: The plan must moderate density, height, setbacks and angles to protect adjacent single-family neighborhoods. It must ensure no degradation in retail services like grocery stores, which need parking. It must ensure a minimum one parking space per dwelling unit for new residents.
- Market: UC needs larger units for families, not high-rises. Affordable workforce housing must be required on-site and first, not elsewhere and later, which often never happens.

Respect UC residents' Community Preferred Plan. Insist on a Program EIR, current data, and. fairly balanced growth. Send this plan back. Support the Community Preferred Plan.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42450

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 9:52:02 PM

Submitted on Wed, 06/12/2024 - 21:51

Submitted values are:
Contact Info

Name:: Maria Amalia Prada
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.
The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.
The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.
The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42449

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 9:42:30 PM

Submitted on Wed, 06/12/2024 - 21:42

Submitted values are:
Contact Info

Name:: Matthew Roosevelt
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I am a voter from La Jolla Colony in UTC. I strongly support the UCPG recommended changes to the Draft University Community Plan Update. All San Diegans need to do their part in helping the housing crisis, but it shouldn't all fall on one or two neighborhoods. Thank you for considering these changes which will help solve the housing crisis while not overwhelming the University City area.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42448

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 9:08:31 PM

Submitted on Wed, 06/12/2024 - 21:08

Submitted values are:
Contact Info

Name:: David Lambert
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Same as above.

Comments::
I live in University City on Stadium Place. I very strongly support the original University Community Plan without changes and NOT approving the University Community Plan. If that is not done, I strongly support the UCPG recommended changes to the Draft University Community Plan Update. In either case, I very strongly oppose the Draft University Community Plan without the UCPG changes.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42445

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 9:00:46 PM

Submitted on Wed, 06/12/2024 - 21:00

Submitted values are:
Contact Info

Name:: Amalia Prada
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42444

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 8:56:10 PM

Submitted on Wed, 06/12/2024 - 20:56

Submitted values are:
Contact Info

Name:: John P. Bott
[redacted]
City:: San Diego
State:: CA 92122 3238

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: University Community Plan Update

Comments::

My Name is John P. Bott
I live at

[redacted]

I support the UCPG recommended changes to the Draft University Community Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42443

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 8:53:25 PM

Submitted on Wed, 06/12/2024 - 20:53

Submitted values are:
Contact Info

Name:: Milo Worsham
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I live in University City 92122.
I support the UCPG recommended changes to the draft University Community Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42442

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 8:46:58 PM

Submitted on Wed, 06/12/2024 - 20:46

Submitted values are:
Contact Info

Name:: Susan Worsham
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I live in University City (92122) and I support the UCPG recommended changes to the Draft University Community Plan Update.

These changes include lower density, larger setbacks and lower height restrictions.

Thank you.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42441

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 8:29:09 PM

Submitted on Wed, 06/12/2024 - 20:29

Submitted values are:
Contact Info

Name:: Paula Krahn
[redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: #6

Comments::

Please give serious thought in voting to approve the plans to increase UC's population by 30 to 60,000 people over the next 20 years. UC is very dense already with many apartment homes that house UCSD students (and as the university grows, this area becomes more congested). All you have to do is drive around the area and you will see that every available vehicle space on the street is used because the apartment homes usually house 3-4 students and there is not enough parking in the complex for each student. I realize the trolley is available to everyone but it is not used by many. San Diego is not your typical subway/trolley city and people are accustomed to using their own vehicle. I understand that the city would like people to use mass transit but in reality San Diego is a sprawling city and the trolley doesn't work for most people.

Drive around UC between 4-7 pm and note the traffic on LJ Village Drive, Genesee, Governor and the many other streets in this little enclave. There are many other areas that are not this congested. Revitalizing other areas of San Diego and areas that have vacant buildings and lots would be a much better option. It would bring positive growth where they need it. There are many areas in San Diego that have potential for growth and revitalization and could use a project of this nature. UC is already thriving and doesn't need more growth and congestion in the manner that has been outlined in the current proposal.

I could go on and on but you probably won't read my email in its entirety as it is. I would welcome the opportunity to meet with you and your committee. I am not alone in my feelings about you proposed plans. Please reconsider the UC proposal and look elsewhere for revitalization and growth.

Thank you for your consideration and time.

Paula Krahn

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42438

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 8:26:37 PM

Submitted on Wed, 06/12/2024 - 20:26

Submitted values are:
Contact Info

Name:: Robin Read
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: #6 Draft University Community Plan Update

Comments::
As a resident of University City in 1984, I support the UCPG recommend changes to the Draft University Community Plan Update. Including but not limited to the following:

- Maximum 145 du/ac
- Larger setbacks and transitions for new buildings adjacent to existing residential & open space
- Reduce City's proposed 100' height limit at South UC shopping centers to 40' at Sprout's center and 50' at Vons center
- Require that new residential developments and mixed use (commercial and residential on same site) provide public spaces and recreational opportunities

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42437

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 7:26:15 PM

Submitted on Wed, 06/12/2024 - 19:26

Submitted values are:
Contact Info

Name:: Rebecca J Cosford
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: University Community Plan Update

Comments::
Dear Council Members
I urge to you take into consideration the voices of the University City residents regarding the plan to significantly increase the density of our neighborhood and change our quality of life. As a 27-year resident of University City, I have loved the sense of community and neighborhood we have developed. Also, our values for protecting Rose Canyon, and connections with each other through parks and neighborhood activities. Please adopt the UCPG recommended changes to the Draft UC Plan update, especially those pertaining to dwelling units per acre and proposed heigh limits. We also must protect our natural environment and open spaces to maintain our existing cultural connections with nature and each other. To do anything else will destroy our way of life in the name of so called progress and will further undermine our belief that our government has any interest representing the people who elected them (.. as opposed to the business/development interests who lobby them so strongly).

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42434

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 7:08:13 PM

Submitted on Wed, 06/12/2024 - 19:08

Submitted values are:
Contact Info

Name:: Pedro Aza-Blanc
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since
it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42431

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 7:02:41 PM

Submitted on Wed, 06/12/2024 - 19:02

Submitted values are:
Contact Info

Name:: Victoria Aza-Rossi
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

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The Complete Communities Housing Solutions program should be suspended since
it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42429

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 7:00:34 PM

Submitted on Wed, 06/12/2024 - 19:00

Submitted values are:
Contact Info

Name:: Mirian Schnaidman
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

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The Complete Communities Housing Solutions program should be suspended since
it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42428

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 6:58:53 PM

Submitted on Wed, 06/12/2024 - 18:58

Submitted values are:
Contact Info

Name:: Devora Rossi
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since
it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42427

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Wednesday, June 12, 2024 6:15:04 PM

Submitted on Wed, 06/12/2024 - 18:14

Submitted values are:
Contact Info

Name:: George Rawlins
Email: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item 6: University City Plan Update

Comments::
Dear Mayor and Councilmembers:

Yet again I'm writing to ask you to listen to what residents want for our own communities. So far, you clearly you have nothing but contempt for a great number of San Diego citizens.

But because this is so important, I again ask for at least somewhat reasonable development so that our city remains America's Finest City and support the UCPG recommended changes to the Draft University Community Plan Update. Please listen to the residents of University City!

Sincerely,

George Rawlins

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42420

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 9:52:35 AM

Submitted on Thu, 06/13/2024 - 09:52

Submitted values are:
Contact Info

Name:: Saad
Email:: info@yimbydemssd.com
City:: La Mesa
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: Item 6

Comments::

We need you to submit written comments supporting the University Community Plan Update (CPU) and the Hillcrest Focused Plan Amendment by Wednesday, 5 pm June 12, ahead of the June 13 San Diego City Council Land Use and Housing Committee meeting (agenda here).

Here's how to submit two separate written comments:

Complete this form with your info.
Fill in the following details for the University CPU:
Meeting Date: 6/13/2024
Select Agenda Comment
Enter Item 6
Write your comment or submit the sample below. Mention your City Council district number where you live (Find it here).
Go back to the original form and fill in your info again.
Fill in the following details for the Hillcrest Plan Amendment:
Meeting Date: 6/13/2024
Select Agenda Comment
Enter Item 7
Write your comment or submit the sample below the University CPU comment. Mention your City Council district number where you live (Find it here).

Sample Comment - University CPU

As a [renter/homeowner/student] in District [X], I strongly support the University Community Plan Update. This plan will allow more housing, expand transportation choices, create new public spaces, and help meet our climate goals.

By enabling over 28,000 new homes in a high-opportunity transit-rich area, it will expand access to jobs and education. The CPU's vision for enhanced

walking, biking, and transit will make it easier for people to get around sustainably. The new parks, greenways, and recreational amenities will improve the quality of life.

I've seen the need for more housing and transportation options in this area. [Add 1-2 sentence personal anecdote].

Please approve the University CPU to put San Diego on a path to a more affordable and sustainable future.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42502

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 9:58:07 AM

Submitted on Thu, 06/13/2024 - 09:58

Submitted values are:
Contact Info

Name:: Gary
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: #6

Comments::
We live in University City

We Strongly support the UCPG recommended changes to the Draft University Community Plan Update.

UCPG recommended changes to the City's Draft Plan include lower density maximums per site
City's Plan Update would allow 290 du/ac (dwelling units per acre); UCPG recommends maximum 145 du/ac

Larger setbacks and transitions for new buildings adjacent to existing residential & open space
reduce City's proposed 100' height limit at South UC shopping centers to 40' at Sprout's center and 50' at Vons center, in line with what the City consistently showed for years in their presentations to the public
stronger policies to protect, enhance and enjoy the natural environment and to integrate nature throughout the Plan Area

Requirement that new residential developments and mixed use (commercial and residential on same site) provide public spaces and recreational opportunities (the City required this in a previous draft of the plan but has now made it optional due to opposition by developers)

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42504

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 10:04:55 AM

Submitted on Thu, 06/13/2024 - 10:04

Submitted values are:
Contact Info

Name:: James Marlow
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Greetings,
The June University Community Plan Update unnecessarily attempts to almost double the UTC population with high density housing, while reducing or inadequately providing sufficient quality of life essentials like grocery stores, pharmacies, banks, post office, places to eat, parking, schools, parks, and shopping.
It will increase vehicle traffic substantially while removing traffic lanes. Further, our quality of life will be negatively impacted by noise and air pollution from construction and traffic.
While progress to mitigate various deficiencies in the Community are addressed in the June Draft Plan, e.g., open spaces, it is important to recognize that "better" is not necessarily "good enough."
Virtually no one here in UC wants to live in a downtown San Diego clone. That's not what attracted us to live here. We are not Manhattan or Chicago, each with a long history of high-rise "living" and mass transit, and we do not care to do so.
There needs to be a 3rd Draft that results from active engagement by the SD Planning Department that negotiates and integrates the substantial public input from groups like the UC Planning Group and UC PEEPS, as well as updating the Environmental Report for today's conditions and related assumptions driving the future.
Thank you for addressing these issues in a balanced and rationale manner reflective of the public's preferences.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42507

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 10:11:24 AM

Submitted on Thu, 06/13/2024 - 10:11

Submitted values are:
Contact Info

Name:: Emilio Ingrasci
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Hello Chair Lee and City Councilmembers, my name is Emilio, and I am a member of RideSD. I'm here to express my support for the University City Community Plan Update. The SMART Corridors proposed in this plan will improve our transit system by giving buses their own right-of-way. This will make transit faster, more reliable, and more competitive, boosting ridership and enhancing the experience for current riders. I urge you to approve this plan and implement the SMART Corridors as soon as possible. Thank you!

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42510

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 10:34:23 AM

Submitted on Thu, 06/13/2024 - 10:34

Submitted values are:
Contact Info

Name:: Michael Kozma
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I am opposed to the University Community Plan Update.

The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities.

Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at these shopping centers should be increased to 30 feet, and required commercial space should be 80% of the ground floor area.

Before moving forward with the UCP Update, a finalized Environmental Review should be published with an analysis of the Community Preferred Scenario submitted by the University Planning Group.

The University Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.

Councilmember Lee has expressed, in multiple meetings, concerns about Governor Drive being reduced to two lanes and a lack of infrastructure improvements. These concerns alone should prohibit any endorsement of this plan without further review.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42517

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 10:45:01 AM

Submitted on Thu, 06/13/2024 - 10:44

Submitted values are:
Contact Info

Name:: Mark Rifkin
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I am a resident of District 1 near Nobel Dr trolley station and am writing to express my strong support for the University Community Plan Update. We need more housing and it is great to build it in such an opportunity-rich area! Please support the plan and continue to remove barriers to denser housing development in our community.

I also want to express my support for the sustainable mobility aspects of the plan. It is very difficult and scary to access much of our community outside of a car. One illustrative example is the La Jolla Village Dr and Genessee Rd intersection, where pedestrian crossings are banned on the north side. My aging relatives had to cross this street recently and were forced to use the Executive Dr trolley overpass which was difficult and time consuming for them. The lack of pedestrian crossings on certain sides of intersections is very common across the community and seems like it would be a cheap and easy way to improve pedestrian accessibility. I hope the city continues to improve the pedestrian and cyclist experience.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42519

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 10:51:45 AM

Submitted on Thu, 06/13/2024 - 10:51

Submitted values are:
Contact Info

Name:: Veronica
Email:: Ayesta
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 9

Comments::
Full support for the UCPG recommended changes to the City's Draft Plan include
• lower density maximums per site UCPG recommends maximum 145 du/ac • larger setbacks and transitions for new buildings adjacent to existing residential & open space • reduce height limit at South UC shopping centers to 40' at Sprout's center and 50' at Vons center, in line with what the City consistently showed for years in their presentations to the public
• stronger policies to protect, enhance and enjoy the natural environment and to integrate nature throughout the Plan Area • requirement that new residential developments and mixed use provide public spaces and recreational opportunities not optional

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42521

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 10:50:32 AM

Submitted on Thu, 06/13/2024 - 10:50

Submitted values are:
Contact Info

Name:: Rolf Hollstein
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 9

Comments::
Hello. I live in South University City.
I support adoption of the UCPG recommended changes to the Draft University Community Plan Update. The UCPG has proposed well-thought out changes through a democratic process with community involvement that should be respected.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42520

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 10:52:47 AM

Submitted on Thu, 06/13/2024 - 10:52

Submitted values are:
Contact Info

Name:: Sofee Hollstein
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 9

Comments::
As a resident of south University City, I support the plan proposed by the UCPG because of the increased environmental protections and upholding of the democratic value of representation in changes due to citizen input

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42523

Blueprint SD – Environmental Impact Report

Land Use & Housing

June 13, 2024

NEIGHBORS for a BETTER SAN DIEGO

Key Environmental Impact Report Issues

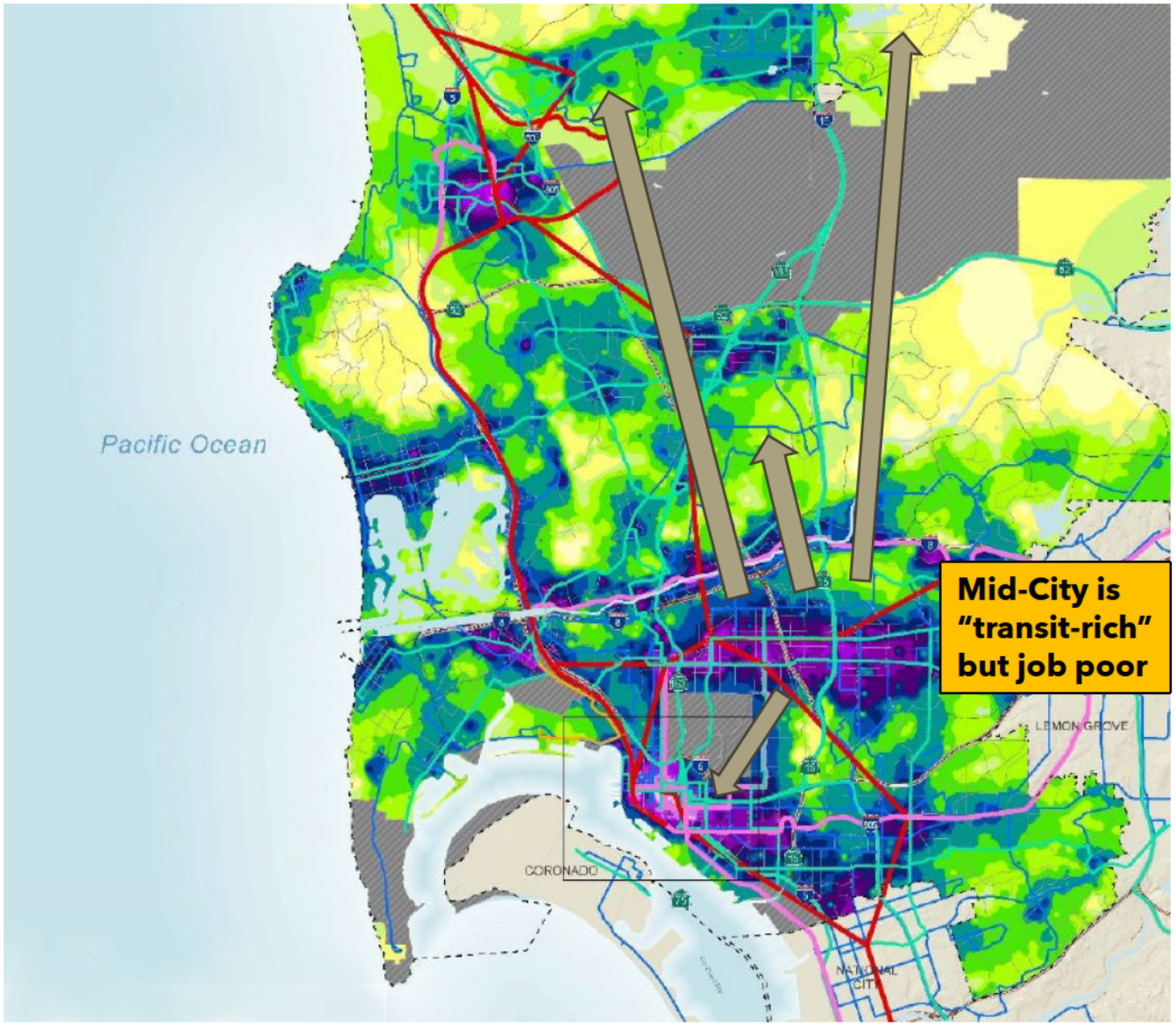
Blueprint SD

- Flawed assumptions of Village Climate Goal Propensity Map

University CPU and Hillcrest FPA

- Failure to consider impacts of Complete Communities Housing Solutions

Village Climate Goal Propensity Map



Why is the map so wrong?

The VCGPM is based on wishful thinking re: Transit Buildout

Expected buildout will not make San Diego transit-oriented

- Transit-oriented cities have at least ***5 times*** the population density of San Diego
- Our topography limits access from neighborhoods south of I-8 to high-quality job centers north of I-8

The most "transit-rich" area on the map doesn't have transit that takes residents directly to high-quality jobs

- Most Mid-City bus lines are a vestige of the 1940s, when San Diego didn't extend north of Mission Valley and downtown was the only major job center

Why is the map so wrong?

The VCGPM is based on wishful thinking re: Population

Declining Projections

VCGPM based on outdated Series 14 SCS Data:

- **Series 14 SCS** 2050: 1.65M +269k **(+20%)** from 2022
- **Series 15 Baseline** 2050: 1.42M +65k **(+4.8%)** from 2022
- **Projected population growth down by -75%**

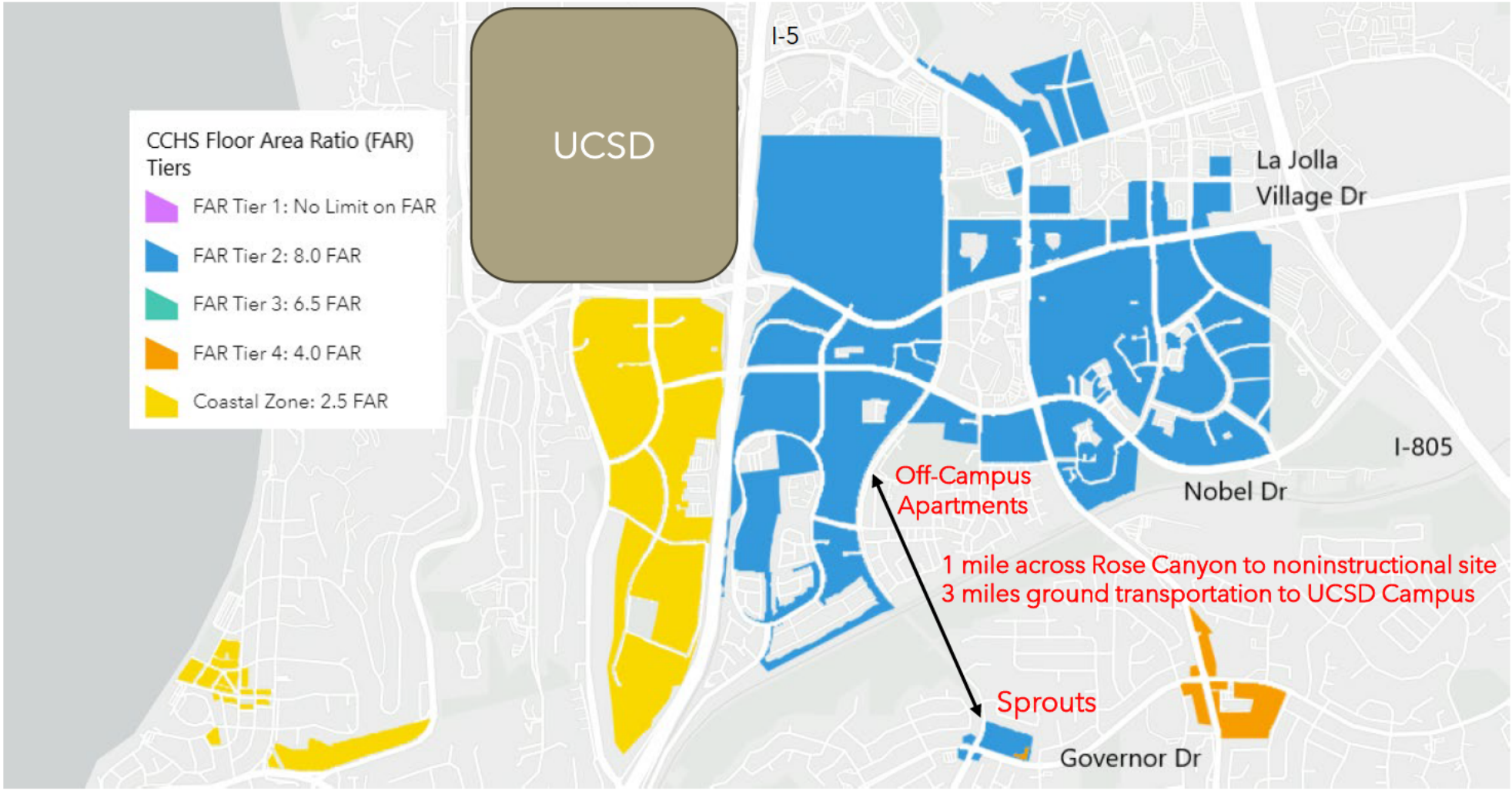
Complete Communities Housing Solutions: The invisible hand of community planning

Community	Community Plan Update (proposed)	Complete Communities Housing Solutions	CCHS increase over proposed CPU
Hillcrest	53,000	241,000	350% increase
University	57,000	215,000	277% increase

The capacity for new housing under Complete Communities Housing Solutions dwarfs what is being proposed in community plan updates.

Yet we don't analyze – let alone mitigate – the impacts.

Broad CCHS overlays confound planning goals



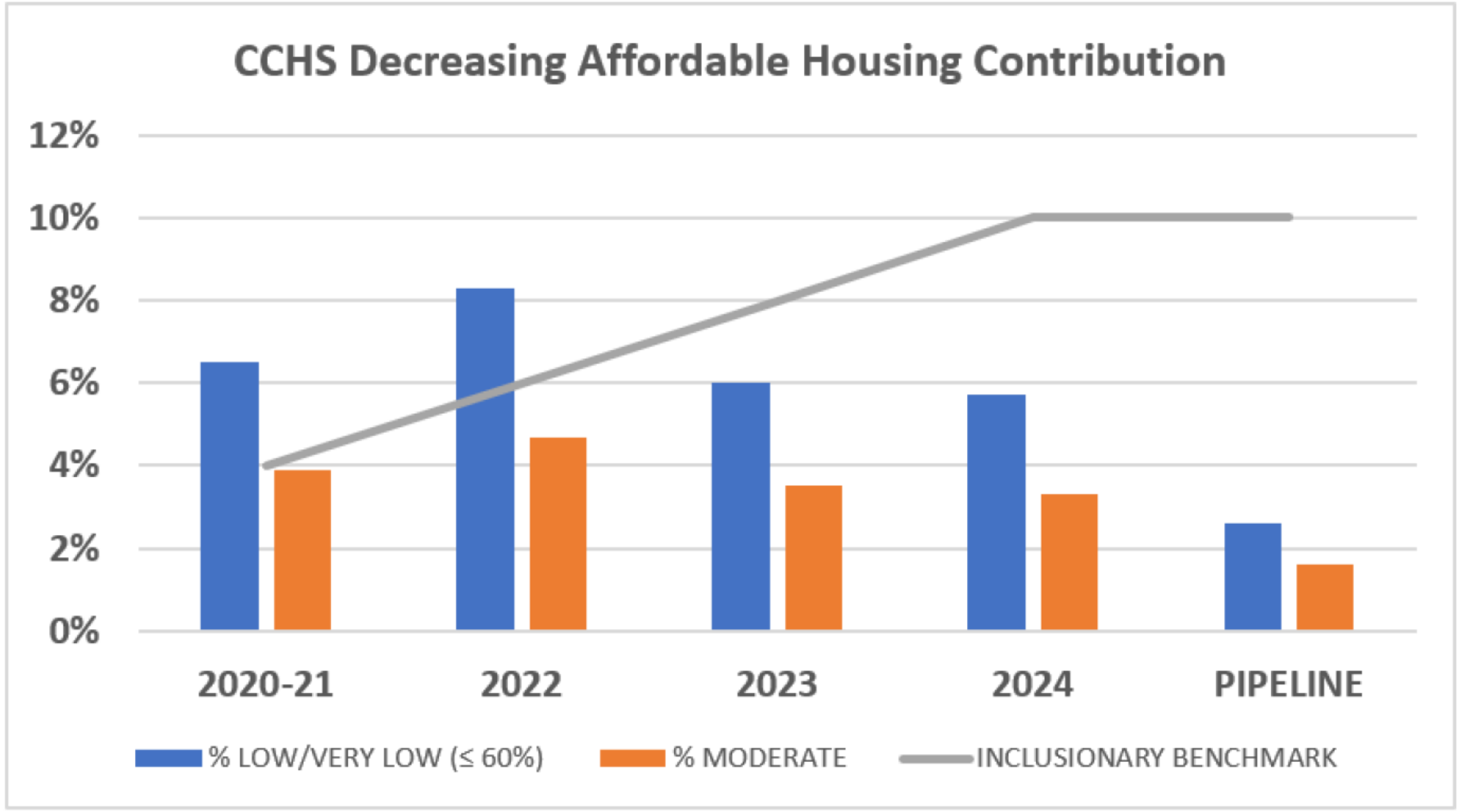
The proposed plan update would take the Sprouts site to 623 units (73 du/acre). Complete Communities Housing Solutions would allow a further increase to 3,189 units, without any analysis or mitigation of the added impacts.

“housing at every price point” excuses underperformance on housing affordability

6th RHNA Cycle (2021 - 2029)		Progress Reports (2021 - 2023)		
Income Group	Percentage of AMI	Permits	% Share	% Target (Pro-Rated)
Above Moderate Income	>121	16,401	82%	112%
Moderate Income	81-120	275	1%	4%
Low Income	51-80	1,859	9%	32%
Very Low Income	31-50	1,586	8%	17%
Extremely Low Income	0-30			
TOTAL		20,121	100%	56%

As in previous RHNA cycle, we are:

- **Overproducing Above Moderate housing**
- **Undercounting Moderate Income housing**
- **Underproducing Lower Income housing**



As development pivots to Complete Communities, affordable housing contributions lag behind inclusionary housing requirements

Recommendations

Village Climate Goal Propensity Map

- **Re-run models with realistic, fundable transit buildout targeted to limited high-density areas**
- **Re-run models with best available (Series 15) population and housing projections**

Complete Communities Housing Solutions

- **Let community plan updates work as planned**
- **Suspend CCHS upon adoption of Community Plan Update**

Thank you!

Geoffrey Hueter
Chair, Neighbors For A Better San Diego
NFABSD.org

NEIGHBORS for a BETTER SAN DIEGO

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 11:03:29 AM

Submitted on Thu, 06/13/2024 - 11:03

Submitted values are:
Contact Info

Name:: Catherine Garay
Email: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: ITEM 6: UNIVERSITY COMMUNITY PLAN UPDATE

Comments::
Dear Land Use and Housing Committee,

I am writing today with concern. Concern over the plans to change the beautiful and special neighborhood of University City, my home and the home of my young daughter.

UC offers a rare and wonderful combination of things: diverse community in both age and culture, access to goods and services, great schools, open places to play, and most importantly... nature.

University City is rare in that upon its planning, nature and wildlife were considered. I was told that the neighborhood was designed to allow animals to travel through and not be as limited as they would be in more typical developments. Because of this we are blessed with native plants and many wildlife sightings each day. My daughter's wonder of the natural world is supported here. She feels connected.

So, when I hear of plans to increase the population, increase the heights of buildings, make changes that would increase the number of cars and traffic, my heart breaks. I wonder, is anyone considering nature? Has everyone forgotten that we are connected to nature? That my daughter's love and wonder of the natural world is pure and not to be forgotten simply because we get older?

With more people comes less natural space and an increase of pace and tension. With too high buildings comes no view of the sky. With more cars comes more pollution and more danger to an already dangerous neighborhood to walk. (I can comment on this another time).

We just returned from a trip to Washington DC and a visit to the Natural History Museum. There were multiple exhibits of how humans are causing harm to the Earth, one was called Humans Spread, Extinctions Follow. Something to think about.

Please, please, please consider more when making these decisions. Please remember what my daughter has not yet forgotten. And please preserve what makes UC so special.

Thank you.
Catherine Garay

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42524

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 11:08:42 AM

Submitted on Thu, 06/13/2024 - 11:08

Submitted values are:
Contact Info

Name:: Deborah Knight
Email: [redacted]
City:: San diego
State:: Ca

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Please support the U PG recommendations

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42526

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 10:52:47 AM

Submitted on Thu, 06/13/2024 - 10:52

Submitted values are:
Contact Info

Name:: Sofee Hollstein
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 9

Comments::
As a resident of south University City, I support the plan proposed by the UCPG because of the increased environmental protections and upholding of the democratic value of representation in changes due to citizen input

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42523

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 11:15:05 AM

Submitted on Thu, 06/13/2024 - 11:14

Submitted values are:
Contact Info

Name:: Glen Rasmussen
Email:: [redacted]
City:: La Jolla
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Please keep the zoning for retail in U City, CC 3–9. Put EMX elsewhere in that mesa and stop destabilizing out communities like this proposal!

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42529

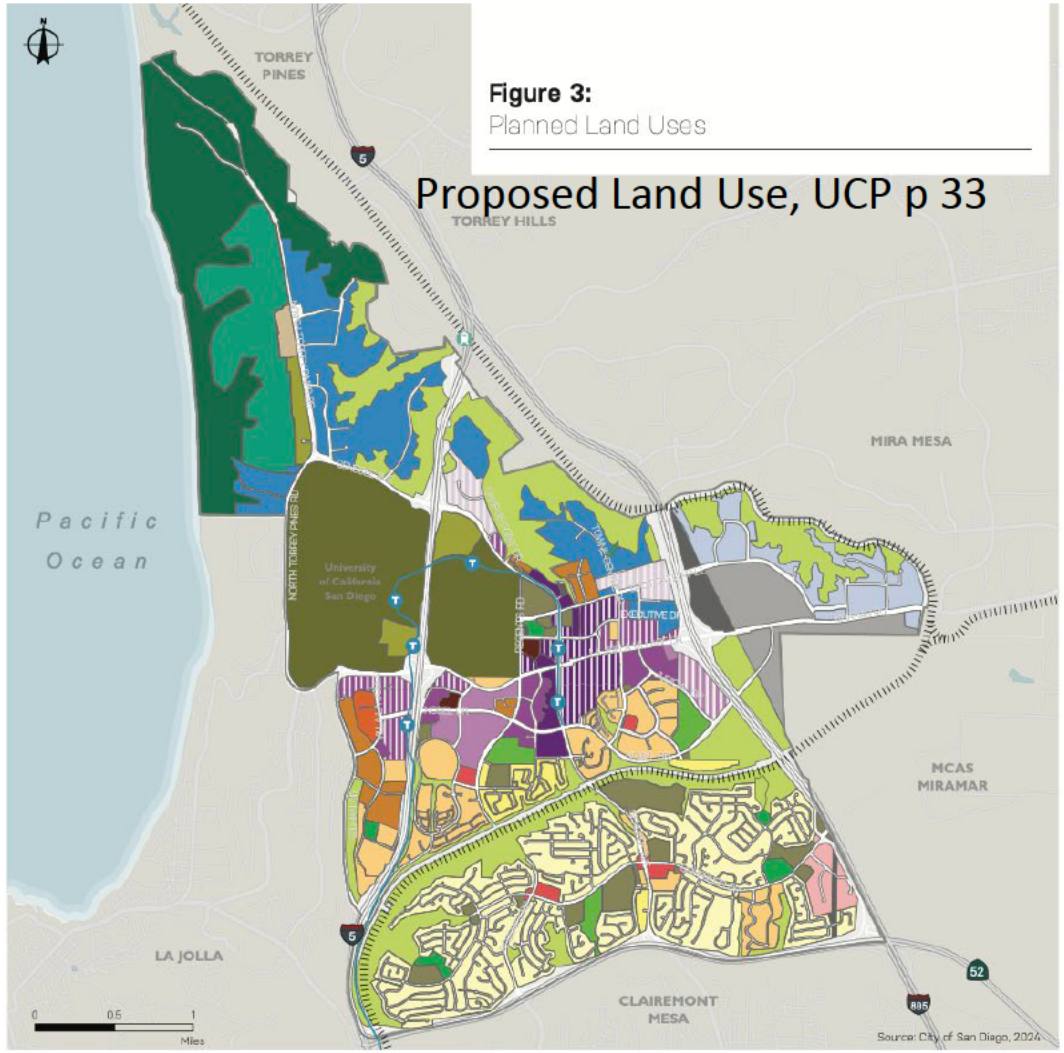
UCPG Report to City Council, Land Use and Housing Committee

University Community Planning Group

Andy Wiese,

UC Plan Update Subcommittee Chair & UCPG Board Member

June 13, 2024



UCPG Summary Recommendations

Report and Recommendations of the University Community Planning Group on the Draft-University Community Plan University Community Planning Group, May 15, 2024

1. Land Use Intensity

Include UCPG Alternative Land Use Scenario as an F-EIR alternative.

Support "Mesa Nueva" model, UCSD East Campus – (~145 du/ac.).

Local exemplar of affordable, vibrant, high-density development.

2. Parks Deficit:

~ 4,000 recreational value point deficit

Infrastructure deficit planned for ~40,000 people.

A red flag that plan is over-built.

UCPG Alternative Land Use Scenario does better.

3. Zoning and Displacement – Nobel/Campus Area

Zone Community Commercial (Not EMX-2). Suggest CC-3-9

Protect community retail and promote affordable housing.

4. UCPG Supports Public Space Requirements, SDRs A.1-5

1. Land Use Intensity

- “Mesa Nueva,” (UCSD E Campus): Model for UCPG land use scenario – 145 du/ac.

- Affordable, vibrant, high-density development with green space and pedestrian orientation.

Recommendation:
F-EIR should study UCPG Land Use Scenario as one Alternative.

2. Parks Deficit

Concerns and Recommendations:

- **Planned recreational value – parks deficit**,
  - (4,000 points=40,000 people)
- Recreation center/aquatic center deficit
- **Deficits are a *red flag that the Plan’s land use scenario is overbuilt***.
- **Plan must meet City Parks Master Plan standards in UC – and city-wide.**
- **Follow recommendations in UCPG Report**

Governor Drive

3) Zoning and Displacement:

Nobel/Campus Area

-Shops at La Jolla Village
(Whole Foods)
-La Jolla Village Square
(Ralphs, Trader Joe's)

- Main community shopping area in north UC
- Walking distance to UCSD
- Only shopping plazas and groceries on the Blue Line north
- EMX-2 Zoning threatens future retail and housing.
- Zone 'Community Village' (not Employment Mixed Use) to protect housing and community serving retail; prevent competition with Biotech/HQs/etc.
- Density - 145 DU / Acre (same as UCP Scenario)
- Plan above San Diego "Prop D" 1970 30' height limit
- Expand Public Space Requirement - Plan for Neighborhood Scale Park with redevelopment

4) UCPG Supports Public Space Requirements, SDR A.1-5

Sample Public Space Requirement (below):

For *new* development in UC CPIOZ only (see Fig 35, p 186)

Example: "Sprouts" Plaza, Governor Drive
Parcel size, approximately **~360,000 sf** (Google Maps)
Public space requirement, **~18,000 sf** (5% of parcel)

SDR-A.2 Public Space Design and Access Requirements

Size. A minimum of 5 percent of the premises of the *development* shall be provided as public space. (Maximum 75,000 sf) (UC Plan, p 190)

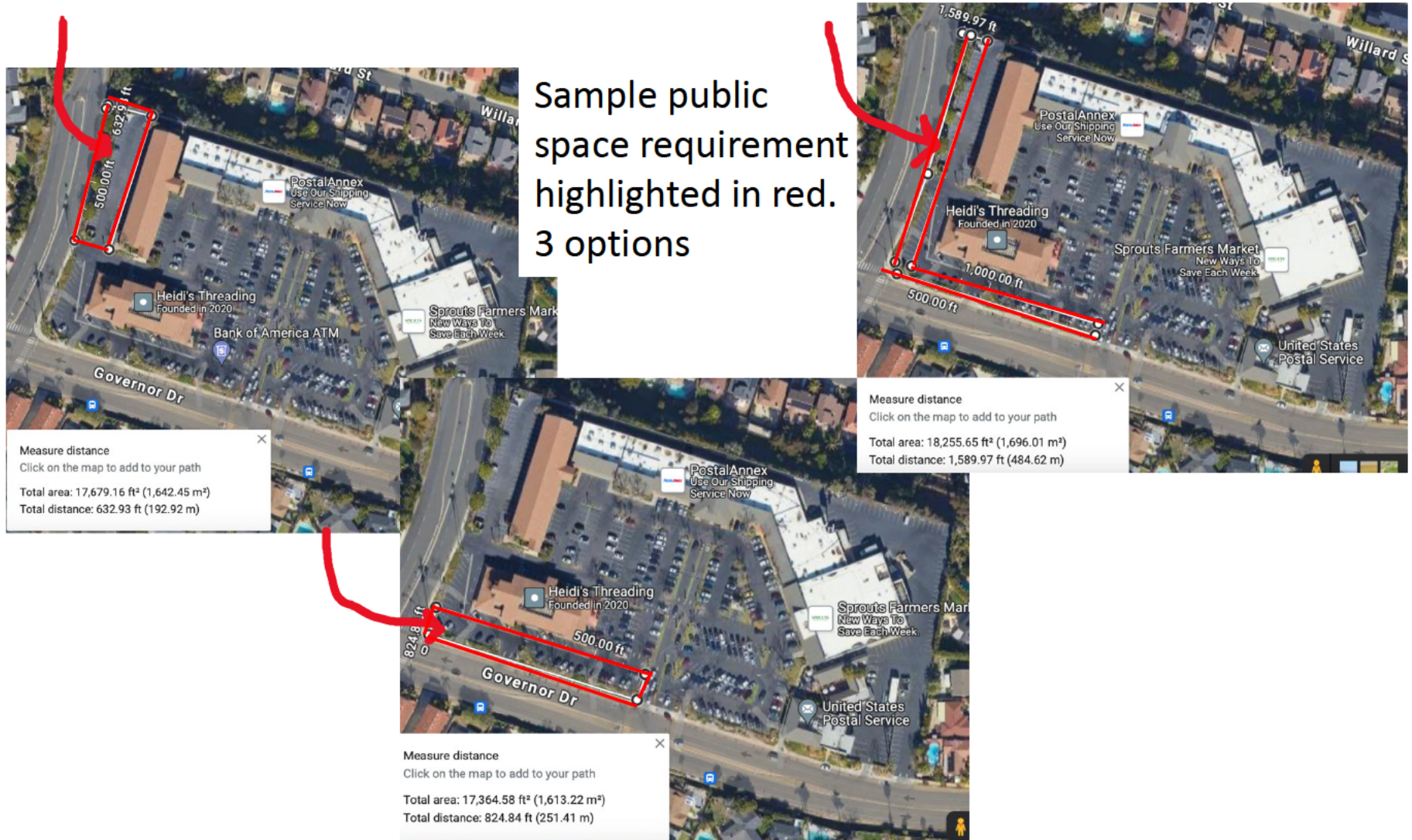
SDR-A.1 Required Public Spaces

Amenities. Public spaces require amenities based on size of parcel. (UC Plan, p 188)

E.g., 200,000-400,000 sf require 3 amenities from Table 2, p 189.

Amenities include shade pavilions, seating, play areas, interactive elements, etc.

Sample public space requirement highlighted in red. 3 options



From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 11:31:49 AM

Submitted on Thu, 06/13/2024 - 11:31

Submitted values are:
Contact Info

Name:: Marco Zirino
Email:: [redacted]
City:: San Diegop
State:: ca

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Non-Agenda Comment

Comments::
Hi. I live at [redacted] and I want to declare my support for the UCPG recommended changes to the Draft University Community Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42532

From: SDGov Webmaster
To: Burch, Tyler
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 1:50:04 PM

Submitted on Thu, 06/13/2024 - 13:49

Submitted values are:
Contact Info

Name:: Lynne Mar
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: UC

Comments::
I'm opposed to the City's revised University City Plan Update, which proposes to more than double the number of housing units and population. The overall density proposed should be reduced to no more than 22,000 additional housing units, per the Community Preferred Plan.

The Plan Update doesn't consider our limited infrastructure and provides no new park and recreation centers until after 2043. It excludes much-needed new schools, as well as fire and police coverage. It's largely dependent on upgrades to public transportation that cannot be guaranteed due to lack of funding. It proposes Governor Drive be two lanes, which would cause horrendous congestion and deadly circumstances if we needed to evacuate.

The height limit zoning at the Sprouts center should be no more than 40 feet and the housing density 0-29 dwelling units per acre. The height limit zoning at the Vons center should be lowered to 50 feet and the housing density to 0-54 dwelling units per acre. Setbacks should be at least 30 feet from adjacent residential properties. A minimum of 80% of ground floor space should be devoted to retail.

The Complete Communities Housing Solutions program should be suspended since it directly conflicts with the UC Plan Update.

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42559

From: SDGov Webmaster
To: Burch, Tyler
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Thursday, June 13, 2024 12:58:37 PM

Submitted on Thu, 06/13/2024 - 12:58

Submitted values are:
Contact Info

Name:: Paul Goldstein
Email:: [redacted]
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
I want to express my strongest opposition to the University Community Plan Update due to its monstrous and disproportionate scale of overdevelopment, its poor environmental review, the lack of adequate transportation and above all, its lack of real possibility of affordable housing. This proposal takes a virbrant diverse neighborhood, proposes to double its population with no consideration of amenities, parks, schools or transportation resources, nor the character of what is already a thriving walkable community

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42550

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Friday, June 14, 2024 1:29:45 PM

Submitted on Fri, 06/14/2024 - 13:29

Submitted values are:
Contact Info

Name:: Loki Natarajan
City:: San Diego
State:: CA

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 1

Comments::
Hi,
I live in University City, and support the UCPG recommended changes to the Draft University Community Plan Update, specifically the recommendation to lower density & height limits and increase/preserve green/park space.
Loki

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42674

From: SDGov Webmaster
To: Kessler, Natalie
Subject: Webform submission from: Land Use and Housing Committee Public Comment Form
Date: Monday, June 17, 2024 9:59:00 AM

Submitted on Mon, 06/17/2024 - 09:58

Submitted values are:
Contact Info

Name:: Gregory Essayan
Email:: [redacted]
City:: San Diego
State:: California

Meeting Info

Meeting Date:: 2024-06-13
Comment Type: Agenda Comment / Closed Session Comment
Agenda Item Number: 6

Comments::
Hello Chair Lee and City Councilmembers, my name is Greg, and I am a member of RideSD. I'm here to express my support for the University City Community Plan Update. The SMART Corridors proposed in this plan will improve our transit system by giving buses their own right-of-way. This will make transit faster, more reliable, and more competitive, boosting ridership and enhancing the experience for current riders. I urge you to approve this plan and implement the SMART Corridors as soon as possible.

I would also encourage that the construction of the SMART Corridors be optimized to account for bicycling infrastructure, as well as bus/public transit. This includes Class IV cycle tracks, and an expansion of the locked-box bicycle storage units. This will encourage cycling in the area, making it safer both on and off the road.

Thank you!

The results of this submission may be viewed at:
https://www.sandiego.gov/admin/structure/webform/manage/webform_1032443/submission/42856

PUBLIC COMMENT - PLANNING COMMISSION MEETING OF MAY 30, 2024						
First Name	**Last Name**	**Agenda Item Number**	**Position**	**Comments**	**Supporting Documents (Li**	**Colum**
Judith	Bellin	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		
jack	Forman	**3**	In Opposition to Item	I am opposed to the University Community Plan Update because it would add far more density than our community can handle. In my opinion, it should be cut in half - at the minimum. Also, the UC Plan Update does not provide anyways near the infrastructure needed to support any population increase. Where in the plan has the City provided for additional parks, recreation centers, schools, fire & safety infrastructure and roadways? In addition, it does not address the community's vulnerability to wildfires and earthquakes, and it does not discuss evacuation plans in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Finally - and most importantly -- Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority.		
Maria	George	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		

Kathleen	Glasebrook	**3**	In Opposition to Item	I am opposed to the University City Plan Update. We have a perfectly fine community right now, there is no reason to destroy it. We already will hav e plans getting out of here if there is a fire or earthquake. This proposal would make it impossible. Governor Drive is already congested. This plan would make it increasingly dangerous. Think of the 3 schools on this street. This would put the students at great risk. Traffic would not be able to move. With great concern, Kathy Glasebrook		
Tina	Grover	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly		
Robert	Hanna	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly		

Anita	Luk	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		
Alan	Lutze	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		
Eileen and Tony	McKoy	**3**	In Opposition to Item	We have lived in University City for fifty years. Consequently we have seen the population grow while only one street, Genesee, provides access north to south. How the Planning Department can envisage doubling the population is beyond reason. If there is some kind of emergency there is no escape route. Furthermore transportation is already awful. Yes, we have the blue trolley and bus services but for much of UC there is no access to these facilities. Because of our age we gave up our car and we have now to rely on gig services for transportation and groceries because we are about 2 miles from the bus service and 3 miles from the trolley. There are no feeder buses in the neighborhood as there are in European cities. The idea of making Governor Drive two lanes so as to provide bike lanes is madness. There are schools in the area with harassed mothers in cars trying to drop off their kids and then rush to their employment. How is this all going to work for the betterment of UC???? Additionally UC is already suffering through the toilet to tap project. We protest your plan.		
Peter	Milligan	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		

Mark	Mitchell	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		
Joseph	Risse	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		
Joe	Rollinson	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		
Carly	Sheane	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		
Katharine	Walker	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space, new schools, or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities.		

Lan	Wolfkind	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density. I am opposed to the UC community plan. Look at what happened in PB. Crime, massive congestion and still high priced homes. North of Rose Canyon is already heavily congested. Our schools are very packed and old. Our roads are terrible. We cant support doubling our population. That will bring worse quality of life for current residents Thank you Art wolfkind .		
NEW PUBLIC COMMENT ADDED @ 5:00 PM - MAY 28, 2024						
Amanda	Hirko	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		
William	Greer	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly		

Dianna	Barrantes	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly		
Linda	Ponsford	**3**	In Opposition to Item	I am strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. Governor Drive MUST remain 4 lanes so residents are able to leave and reenter their neighborhood. Has anyone taken the time to see the current impact on Governor when 3 schools start and end at the same time? One less lane and a bike lane is the height of ridiculousness. Doesn't the city have other bigger problems right now to handle? Leave UC alone. It is a wonderful community.		
Judy	Church	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly		

Mike	Devens	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly		
Alexander	Mangahis	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor devoted to retail. North side of Governor Drive between Panel Ct and Erlanger St, this particular stretch of Governor Drive poses safety concerns and warrants immediate attention. Guiding my children as they bike to CurieES and shopping mall has been nerve-wracking experience due to cars exceeding 45 MPH, mere feet away from theirbikes. I urge those opposed to the proposed changes to Governor Drive to take a stroll or a bike ride along the route to witness firsthand the unsafe conditions. Transitioning from two lanes to one will naturally regulate the speed of vehicles on Governor Drive, a tactic that has proven effective on other major streets in San Diego, such as Jackson Drive between Golfcrest Dr and Lake Murray Blvd.		
John	Perna	**3**	In Opposition to Item	I am opposed to the University Community Plan. I have lived in the community since 1976. It has been a busy but very comfortable community. The Sprouts an Vons Centers should not be overdeveloped in height or space. New development projects should have not more that 40 feet height and at least 30-foot setbacks. Both centers should have a grocery store. Governor Dr. must remain four lanes to avoid back up congestion. The Complete Community Housing program needs to exempt from the entire plan as it would create very high levels of density! It is already a busy community already and it needs to be kept comfortable for the residents.		

Jim	Heleniak	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by two thirds. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly conflict with the higher levels of density already being proposed.		
Carlo	Greco	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly		
Miriam	Abitbol	**3**	In Support of Item	Please approve item 3- I have lived in San Diego (north county) my entire life and work in the University Community area. The Plan Update as proposed creates the opportunity for more people to live, work and play in close proximity â€“ with minimal use of cars. UC is a fantastic neighborhood that has capacity for more housing where it belongs, near the new trolley, close to UCSD and the medical centers of excellence, and in the center of good jobs. Please move the UC Plan Update forward.		
Lauren	Collins	**3**	In Support of Item	I have been following the progress of the University Community Plan Update for years, and as a person who works in the areas impacted , I am fully in favor of the most housing that can be created here. This is a vibrant area with even more opportunity for homes that we so desperately need in San Diego â€“ especially with the new trolley, plus all of the amenities that are here â€“ shopping, dining, recreation and more. There is community support for density â€“ we welcome more new neighbors!		
Julia	Dimson	**3**	In Support of Item	Planning Commissioners, please approve the UC Plan Update that City staff has worked so hard to bring forward. It reflects the input that many of us who live and work in the area have provided for input, and represents progress â€“ a real understanding of what the future can look like â€“ not stuck in the past. As a young person who would like to live in the University Community, walk, ride and use transit instead of driving to work, this is an important step that is going to create opportunities for me and my friends and co-workers.		

Virginia	Nguyen	**3**	In Support of Item	As a longtime employee working in the University Community, I am all in favor of more housing and more jobs here. The proposed Plan Update has taken years to evolve to a good balance that provides opportunities for homes near transit, with improved mobility options and consideration for the open spaces we need. Please move forward with the recommendations in Item 3 â€“ itâ€™s time to look forward to real housing solutions.		
Adrian	Rosas	**3**	In Support of Item	Please approve item 3! I support more density in the University Community Plan Update because it will allow people to move to the area and lessen commutes they currently take. I can hardly wait for the additional housing options and job opportunities that can come from a forward thinking plan that envisions growth here. Thank you for your consideration.		
Eric	Cohen	**3**	In Opposition to Item	I vigorously oppose the University Community Plan Update, since it adds far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores our vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development at these centers should require at least 80% of ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents can leave and re-enter their neighborhoods, as well as evacuate if needed. This is particularly important during the school year. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly conflict with the higher levels of density already being proposed.		
NEW PUBLIC COMMENT ADDED @ 9:30 AM - MAY 29, 2024						
Susan	Nelson	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly conflict with the higher levels of density already being proposed.		

May	Luong	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		
Anita	Wilson	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly conflict with the higher levels of density already being proposed.		
Marilyn	Fenwick	**3**	In Opposition to Item	There is no way University City can support a doubling in population that is proposed. Infrastructure is lacking and will only be worse. Traffic, even with the trolley, will be unbearable, and open green space will be practically non existent. People should not be made to live this way. There are other , more manageable solutions to the housing problem. No one area should be singled out to bear such a burden. UCSD is poised to expand even more in the same vicinity. The streets surrounding the area are already torn up with all the Water Project construction, following on the heels of the trolley construction. Will it never end? Please don't be fooled into thinking this will solve the housing crisis..there are better ways.		
Patrick	Ziegler	**3**		I am opposed to allowing additional high density housing in University City. I grew up in this community. Your proposal will ruin the local community by allowing too many cars and residents in an area that cannot support this volume of people and construction. This proposal will turn the neighborhood into a high density nightmare for current residents. Please vote no on this proposal.		

Diane	Ahern	**3**	In Opposition to Item	Good morning Planning Commissioners, as a resident of the University City community and an active volunteer with our local fire safe council, Im concerned that the proposed community plan update allows for twice the number of residential units without also designating parcels for much needed public safety infrastructure. The proposed plan also promotes the narrowing of lanes of traffic in some areas, which I think would greatly impact the opportunities for safe and effective evacuation as well as the movement of public safety equipment and personnel. As all of us know, some areas of San Diego have already suffered greatly this year due to either poor infrastructure or lack of infrastructure. Please donâ€™t doom our University City community to a similar fate. Please ask the planning department to plan for reasonable and sustainable growth by insisting that public safety provisions increase as the number of housing units increase. Thank you.		
Sam	Burroughs	**3**	In Opposition to Item	I am vehemently opposed to the University City Community Plan Update, execution of which would result in a more than doubling of the UC population. This effectively would destroy any sense of community as well as individual neighborhoods. The assumption of mass transit usage is false. There will be more traffic with no additional parking in the neighborhoods, where street parking is already at a premium. Strained infrastructure-- park space, emergency services access, parking at commercial facilities used by residents, e.g.-- will result. Higher densities mean more crime, more stress on individuals packed into the same area resulting in more aggressive interactions, and ti has been proven that people living in high density areas suffer more health risks due to higher temperatures, increased incidents of mental illness, and Type 2 diabetes. Neighbor disputes over noise, privacy and limited open space will drive increased aggressive encounters, putting additional strain on the police resources. In short, squeezing people together destroys quality of life for all. Finally, I have owned my home in UC for over 25 years. I have paid hundreds of thousands of dollars into mortgage, taxes and maintenance to achieve a level of equity that will be greatly reduced		
Bonnie	Kutch	**3**	In Opposition to Item	UC PEEPS would like to make a 10-minute PowerPoint presentation. There will be three speakers participating, and in this order: Bonnie Kutch, Michael Kozma and Julie Meirer-Wright. I'm attaching the slide presenation we would like city staff to operate for us. Thank you.	https://www.sandiego.gov/system/files/webform/webform_989827/40377/05-30-24-pp-to-planning-comm-uc-peeps-final.pdf	
Angie	Jones	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.		
NEW PUBLIC COMMENT ADDED @ 4:00 PM 5-29-2024						

Geoffrey	Hueter	**3**	In Opposition to Item	Neighbors For A Better San Diego strongly supports the recommendations of the University Community to suspend Complete Communities Housing Solutions upon adoption of the University 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.	https://www.sandiego.gov/system/files/webform/webform_989827/40392/suspension-of-cchs-in-cpus-with-attachments.pdf	https://www.sandiego.gov/system/files/webform/webform_989827/40392/nfabsd-blueprint-sd-peir-comment.pdf
Alan	Lutze	**3**	In Opposition to Item	To Whom It May Concern, I read that you are in favor of walkable neighborhoods. I live in South University City and for me we have that now. I can walk to the Vons or Sprouts shopping centers on Governor Drive. If I am not buying a lot of groceries I actually prefer walking and do this often. But I am concerned about the plans to redevelop the Vons and Sprouts centers to add hundreds of housing units without any requirement to keep the grocery stores. On top of this Governor Drive would be converted to just one lane in each direction. This means all of those new residents would need to drive on a down sized Governor to head miles away to shop for food. On top of this I keep hearing that there is not any requirement to provide parking for all the new residences. Please donâ€™t destroy University City.		

John	Ziebarth	**3**	In Opposition to Item	I support the policies and goals of the Community Plan, but I cannot support the Update. The unprecedented overly specific SDRs associated with CPIOZ are not only unprecedented within the city, but are unprecedented in the country. Only San Francisco and Seattle require Public Open Space (POS) and that pertains to office buildings over a certain size in areas like downtown or the Amazon Corporate Headquarters. New York does not require POS, but incentivizes POS with additional development rights. Residential and Retail are exempt in all cases. None have the additional specificity of the SDRs which are excessive and deter redevelopment and housing. Whereâ€™s testing and vetting by CMT? The percentage of area required for public space in the Update exceeds the criteria of Seattle and San Francisco by 250% to 500%. Excessive! Community plans are policy documentsâ€”zoning are implementing regulations. Code Monitoring Team made that distinction for 19 years I served. One of CMTâ€™s and 2000 Land Development Code Updateâ€™s mission was to â€œEliminate redundancy and contradictions in development regulations.â€ This Update creates inconsistencies in transparency, building articulation, setbacks, landscape, pedestrian pathways, etc. Use the existing code, donâ€™t rewrite it. Plan Amendment required to refine flawed untested SDRs?	https://www.sandiego.gov/system/files/webform/webform_989827/40406/final-uccpu_2nd-round-comments-4-19-24.pdf	
Nancy	Zytko	**3**	In Opposition to Item	As owner of the Sprouts Center at the corner of Regents & Governor, we have been stakeholders in the community for 45 years. We support the change in zoning and are interested in creating a vibrant mixed-use community village with an active outdoor space to serve our community. We have hired an architect to review the impact of the Community Plan Update. The result has raised serious concerns that the 5% of public space required for the project and the level of specificity in the Supplemental Development Regulations associated with CPIOZ, will make it impractical for us to redevelop. A promenade along the entire street frontage would be 30% short of 5%. It would require 17-1,250 sf plazas. A discretionary deviation may be required causing additional cost, time, and uncertainty. Five percent (21,300 sf public space-about the size of Sprouts) is worth $3.6 million at the Cityâ €™s in-lieu rate of $170/ sf. The Community Planning Groupâ€™s reportâ€™s recommends incentives for onsite Urban Public Spaces for commercial development--incentives not requirements. We feel that this will be a great loss to creating a more active mixed-use village for the community as well as to the housing needs of the community.		

Bretta	Lutze	**3**	In Opposition to Item	Your goal is to make more walkable communities less dependent on cars for transportation. Your plan would eliminate the walkability of our neighborhood by inserting high density projects at the very centers we use for shopping and services. These high density projects are directly adjacent to public schools and would inhibit the ability to walk a child to school as there would be an extreme amount of traffic generated by this proposal. Where would new children attend school? Is parking included? The "world class transportation" you speak about is not in place it would need to be updated. There will be impacts on the schools, transportation gridlock, and a walkable community. That is why I purchased a home here close to schools, grocery stores, post office, library and parks so I could WALK EVERYWHERE. Developers are only looking for profits. Don't be fooled by their plans. SAY NO to these plans to destroy the very model neighborhood that you want to create. All of you should use public transportation for 1 month to see how inadequate it is. REJECT THESE UNVIABLE PLANS!!! WORK WITH COMMUNITIES, DON'T JUST PLACE YOUR UNWORKABLE PLANS ON TOP OF A COMMUNITY THAT WORKS.		
Michelle	Coronado	**3**	In Opposition to Item	Increasing the number of high rises would be problematic for this small community. The reason we chose to live here is because it is away from the city congestion and their high rises. This community is a nice mix of different types of housing. Yes, there needs to be more housing available, but no one really wants to live in an overpriced â€œluxuryâ€ high rise studio apartment. The priority should be on building more townhomes, condos and community needs such as parks and essential shopping. Please do not make this city another downtown.		
M	Petrie	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to a level that is the same as the immediate surrounding residences, and height limits should be the same as that of the immediate surrounding residences. the surrounding area, dwelling units/acre, and height limits should be 50 feet or less.		
Molly	Brodersen	**3**	In Opposition to Item	I am in serious opposition to the proposed mobility revisions to the Planned Bicycle Network Map to add flexible lanes on Genesee Avenue between State Route 52 and Nobel Drive. As someone who drives this route multiple times a day, I can attest that this roadway is already severely congested and further limiting the lanes would drastically increase traffic. Given that the UC neighborhood is surrounded by large steep inclines from the valleys below, bikes are not a frequent enough occurrence to justify such a substantial change.		
Linda	Beresford	**3**	In Opposition to Item		https://www.sandiego.gov/system/files/webform/webform_989827/40460/2024-05-29-hsuc-ltr-to-planning-commission-w-exhibits.pdf	

Jan	Zverina	**3**	In Opposition to Item	As a 20+ year UC resident and member of two HOAs in UC, I am opposed to the University Community Plan Update, and am astounded that the City continues to ignore any input from residents on so many points. The overall proposed density levels simply do not account for the proposed plans for Governor drive with regard emergency services - Genesee Avenue is already unable to handle current congestion levels. Densities at shopping centers in residential areas need to be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density. Please show some TRUE respect for the future of our community!!		
Kathleen	Amaya	**3**		I am very concerned about the limiting of lanes on Governor Drive to one lane in each direction. In the event of an emergency that becomes extremely dangerous with the amount of people currently in the neighborhood, never mind taking driving lanes away while increasing the population. Secondly, as a parent of two young kids at Spreckels Elementary, there is already lots of traffic and parking issues during drop off and pick up. Over one third of the students who attend (meaning over 200) are students who choice in from outside the neighborhood and therefore always drive. Even those of us who live in the neighborhood are not always able to walk or take other modes of transportation. Parents who work often drop off and then drive to work. Improving the quality of the pedestrian experience does not at all necessitate taking away lanes of traffic.		
Kristine	Kappel	**3 & 4**	In Support of Item	I am strongly in favor of anything the city can do to increase density and provide more housing options. We have 6 times the population we had in 1947 yet have not built nearly enough housing. Building near transit to help us reach our climate goals also makes sense. It's time for new attitudes in San Diego - more density, more public transit - to become the World Class City we want to be. It would be great if some of the housing can be condos/opportunity for ownership as owning Southern California real estate is a clear path to building wealth and financial security and housing security. So many of the projects are luxury apartments and we need more condo developments and options for those who want to own homes. I am also in favor of ensuring the infrastructure is in place to handle the population with more parks, stores, transit options, bike lanes, walkable sidewalks and communities. Let's truly become "America's Finest City" by providing more housing and urban infrastructure for everyone.		
Molly	Brodersen	**3**	In Opposition to Item	I am in serious opposition to the proposed mobility revisions to the Planned Bicycle Network Map to add flexible lanes on Genesee Avenue between State Route 52 and Nobel Drive. As someone who drives this route multiple times a day, I can attest that this roadway is already severely congested and further limiting the lanes would drastically increase traffic. Given that the UC neighborhood is surrounded by large steep inclines from the valleys below, bikes are not a frequent enough occurrence to justify such a substantial change.		

Jessica	Grounds	**3**	In Opposition to Item	Planning Commission, We represent families living in South University City and are mothers who live and raise our children here.Â We recognize the need for redevelopment in our community and hope that your plans work to meet the needs of our community. We are very concerned about the planning commissionâ€™s consideration to remove driving lanes from Governor Drive. The decision to reduce lanes on the only main street in our neighborhood will highly impact our ability to safely drop off and pick up our children at Spreckels Elementary, and other surrounding schools. It will negatively impact our quality of life and congest our routes for work, school, services, and impact the overall safety and security for our families. Â We do not see logic in increasing the density of housing and people in our community while also reducing the traffic lanes for safe and efficient travel within and outside of our community. Â We ask that the plan to reduce the traffic lanes on Governor be eliminated from the University City plan completely. Â Thank you for your attention to this important matter. Â Jessica Grounds		
NEW PUBLIC COMMENT ADDED @ 6:30 AM 5/30/2024						
Vladimir	Radomirovic	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density. City intentionally uses incorrect assumptions for population and business increase in UC area. City consistently omits to put requirements for Affordable Housing percentage showing that City cares more about Investors making money than providing Affordable Housing to SD residents. Almost 100% South UC residents oppose the Plan.		

MARYANN	STEWART	**3**	In Opposition to Item	I am strongly opposed to the University Community Plan Update. It will add far more density to our community than can be safely handled. I sincerely believe it should be cut by half. The UC Plan Update absolutely does not provide the critical infrastructure necessary to support any population increase. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in emergencies.
				  The Sprouts center should be no more than 40 ft. high and 0-29 du/ac, and the Vons center should be no more that 50 ft. high and 0-54 du/ac. New development projects at these centers should require at least 80% of the ground-floor space be retail and each should contain a grocery store.
				  I cross Governor Drive daily on foot and by car. It must remain four lanes so residents and parents driving their children to and from all schools in UC every day, are able to do so safely. Having seen how close the fires came to UC in 2003 and 2007, evacuation safety is paramount. Safety must be a priority.
				  Thank you very much.		

Donald	Steele	**3**	In Opposition to Item	While we recognize the need for additional housing The City's currently proposed changes to the " University City Community Plan" and the resulting impacts on the neighborhood and inhabitants are HUGH. The proposed plan will create unwanted upheaval within our community in the short term and also bodes ill for our log-term as it will forever and irretrievably change the make-up of our â€œneighborhoodâ€ community. I urge your further consideration and review based upon the people currently within our community. Don Steele	
Ronald	Askeland	**3**	In Opposition to Item	Please see the Chatten-Brown Law Group letter prepared on behalf of the San Diego Sierra Club. The University Community Plan prematurely adds trails through Environmentally Sensitive lands (ESL) and the Cityâ€™s Multiple Habitat Planning Area (MHPA) without adequate review. Numerous incompatible trials have been proposed in Rose Canyon in habitats that are â€œconsidered sensitive and declining habitatsâ€ and â€œimpacts to these resources may be considered significant.â€ These trails must be removed from the plan until adequate site-specific environmental review is conducted and MSCP compliance is ensured. The proposed trail systems in the University Community Plan are noncompliant with the Cityâ€™s MSCP Subarea Plan because they are not located in the â€œleast sensitive areas of the MHPAâ€ as required. The City has also yet to complete the Natural Resources Management Plans anticipated under the MSCP for these urban habitats. Additionally, the City has failed to secure the required long-term funding mechanism for MSCP implementation. Thus, we urge the City to incorporate a funding mechanism as a mitigation measure, especially given that it admits there will be increased strain on the Cityâ€™s existing open space systems.	
Mary	Raymond	**3**	In Opposition to Item	Planning Commission, We represent families living in South University City and are mothers who live and raise our children here.Â We recognize the need for redevelopment in our community and hope that your plans work to meet the needs of our community. We are very concerned about the planning commissionâ€™s consideration to remove driving lanes from Governor Drive. The decision to reduce lanes on the only main street in our neighborhood will highly impact our ability to safely drop off and pick up our children at Spreckels Elementary, and other surrounding schools. It will negatively impact our quality of life and congest our routes for work, school, services, and impact the overall safety and security for our families. Â We do not see the logic in increasing the density of housing and people in our community while also reducing the traffic lanes for safe and efficient travel within and outside of our community. Â We ask that the plan to reduce the traffic lanes on Governor be eliminated from the University City plan completely. Â Thank you for your attention to this important matter. Â Jessica Grounds [illegible]	

Trever	Raymond	**3**	In Opposition to Item	Planning Commission, We represent families living in South University City and are mothers who live and raise our children here.Â We recognize the need for redevelopment in our community and hope that your plans work to meet the needs of our community. We are very concerned about the planning commissionâ€™s consideration to remove driving lanes from Governor Drive. The decision to reduce lanes on the only main street in our neighborhood will highly impact our ability to safely drop off and pick up our children at Spreckels Elementary, and other surrounding schools. It will negatively impact our quality of life and congest our routes for work, school, services, and impact the overall safety and security for our families. Â We do not see the logic in increasing the density of housing and people in our community while also reducing the traffic lanes for safe and efficient travel within and outside of our community. Â We ask that the plan to reduce the traffic lanes on Governor be eliminated from the University City plan completely. Â Thank you for your attention to this important matter. Â Jessica Grounds	
Thomas	Ruff	**3**	In Opposition to Item	The proposed University Community Plan update shows total disregard for the wishes and the welfare of the people who live in the community. It includes bizarrely out of place high-rise style development in south UC directly bordering single family residences and will more than double the housing density across the plan area without adding a single real park. The huge parks points deficit it contains will reduce quality of life here forever. Do the right thing and reject this irresponsible, draconian plan.	
Andrea	Lehman	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store. Governor Drive must remain four lanes so residents are able to leave and re-enter their neighborhoods, as well as evacuate if needed. Safety should be a high priority. The Complete Community Housing program should be exempt from the entire plan area since it would directly conflict with the higher levels of density already being proposed.	

Jennifer	Crabill	**3**	In Opposition to Item	I am a young UC homeowner and am vehemently opposed to the cityâ€™s proposal for University City that would add more than 64,200 residents by 2050, nearly doubling the neighborhood's current population (by adding just over 30,000 housing units). As historically voiced, I am not opposed to increasing density in the area; however, the city has time and time again the past few years proved their ignorance or perhaps itâ€™s simply negligence by failing to support this proposal with sufficient plans for infrastructure - specifically, for plans for schools to support this population increase and plans for streets to support this population increase (per the anticipated increase in traffic). The most glaring flaw in this proposal is the ludicrous element of reducing Governor from four lanes to two. Additionally, ANY plan MUST include a guaranteed element for a commercial grocery store so UC residents donâ€™t contribute to CO2 emissions and traffic congestion by being forced to drive to farther neighborhoods to do their grocery shopping. This plan needs to be better.	
Kelilah	Federman	**3**	In Opposition to Item		https://www.sandiego.gov/system/files/webform/webform_989827/40537/7267-001-univ-comm-plan-update-pc-comms-5-30-24.pdf
Thomas	Pushpathadam	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.	
Meryl	Berk	**3**	In Opposition to Item	I'm strongly opposed to the University Community Plan Update, since it would add far more density than our community can handle. It should be cut by at least half. The UC Plan Update fails to provide the critical infrastructure needed to support any population increase. It contains no workable solutions for additional parks, recreation centers, schools, fire & safety infrastructure and roadways. It ignores the community's vulnerability to wildfires and earthquakes, and offers no means of evacuating in the event of an emergency. The Sprouts center should be no more than 40 feet high and 0-29 du/ac, and the Vons center should be no more than 50 feet high and 0-54 du/ac. Both should have at least 30-foot setbacks. New development projects at these centers should require at least 80% of the ground-floor space be devoted to retail, and each should contain a grocery store.	

Zdravko	Lukic	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.	
Chelsea	Moore	**3**	In Opposition to Item	I am opposed to the University Community Plan Update, which proposes to more than double the population in UC. The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities. Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at shopping centers in residential areas should be increased to 30 feet, and required commercial space should be 80% of the ground floor area. SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased. The University Community Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.	
PUBLIC COMMENT - ADDED @ 10:30 AM 5/30/2024					
David	Stiffler	**3**	In Opposition to Item	I am on strong opposition to changing Governor Drive from 2 lane to 1 lane for any reason, including a suggestion of bike lanes. Making this change would make Governor Drive, the location of multiple schools, less safe, more congested, and would significantly reduce quality of life for UC residents. Furthermore, when considering this change in the context of city plans to significantly increase the residential population, with no clear plan re: increasing park space or school capacity/grounds, with likely consequences of closing local grocery stores, such a decision makes even less sense. If the city is going to insist on making this change despite overwhelming local opposition, the city should provide clear data, including data in the context of future housing developments, demonstrating that such a change will not lead to the obvious problems mentioned above. The city's lack of transparency, attention to detail and boarder context, and consideration of very reasonable concerns from current UC residents is concerning and disappointing.	

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May 30, 2024

Via Electronic Mail Only

Planning Commission
City of San Diego
E-Mail: planningcommission@sandiego.gov
Copy to: planuniversity@sandiego.gov

Re: 5/30/2024 Planning Commission hearing Item #3: University Community Plan Update

Dear Planning Commission:

This firm represents Friends of Rose Canyon in matters related to the University Community Plan and Local Coastal Plan Update ("UCP/LCP Update" or "UCP") and the adoption of Blueprint San Diego, the City's General Plan Update. This firm submitted detailed comments on the March 2024 Draft UCP, the Draft Blueprint San Diego General Plan Update ("Blueprint SD") and the Draft Program EIR for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update ("Draft PEIR"), all letters dated April 29, 2024.

In the comments submitted on the Draft UCP, Friends of Rose Canyon expressed concern about several aspects of the Plan, including:

- The premature identification of new trails in Rose Canyon Open Space Park and other sensitive habitat areas within MHPA lands;
- The need for amendments to policy language to better reflect the need to address MSCP and MHPA requirements;
- Impacts to sensitive habitat areas from future canyon-adjacent development resulting from the removal of policy language that was in the Discussion Draft UCP. The previous version of the Draft UCP required a 50' setback, building transitions of 45 degrees, locating the long end of the building away from the canyon rim, and avoiding reflective glass facing the canyon.

- Lack of policy commitments or plans related to management, monitoring and enforcement of activities in MSCP lands in order to prevent further habitat damage; and
- Ensuring accurate rezoning for all parcels that should be in the MHPA.

How these comments were (or were not) addressed in the Final UCP are summarized below, and comments related to the Planning Commission review and consideration of the Final UCP and Final PEIR are included as well. We urge the Planning Commission and City Council to adopt a Final UCP that includes edits to address these remaining concerns:

I. Identification of Specific New Trails in Rose Canyon and MSCP Lands Were Removed from the UCP, but Language Still Remains in the Plan to "Design and Construct" New Trails.

Thankfully, the May 2024 Draft UCP removed new trails in Rose Canyon Open Space Park and other sensitive habitat areas within MHPA lands, recognizing that the City must complete a Natural Resources Management Plan for Rose Canyon, as required by the MSCP, and adopt a Citywide Trails Master Plan before proposing new trails in MSCP lands.

Table 7 in the Draft UCP (pages 212-213) identifies Rose Canyon Open Space Park as one of the City's Regional Parks and Open Space facilities. Table 7 correctly notes that "The future Citywide Trails Master Plan will comprehensively plan trail and open space park planning that complies with MSCP consistency findings, Environmentally Sensitive Land regulations, and Natural Resource Management Plans before being formally proposed for City evaluation and funding (see Parks Master Plan policies PP10, CSR25 and RP5)." However, it goes on to include a recommendation to "Design and construct trails that comply with the MSCP consistency findings, Environmentally Sensitive Land regulations, and Natural Resource Management Plans." Since it has not been determined if new trails in Rose Canyon can be consistent with the MSCP, it is premature to include a recommendation to ***design and construct*** new trails in Rose Canyon Open Space Park. Instead, the recommendation for Rose Canyon should focus on improving the existing conditions of the MHPA lands and enforcement to protect the existing habitat from further damage. The recommendation should also address closing existing informal trails through MHPA lands.

Furthermore, the table should not include a "Proposed Recreational Value", which suggests that additional facilities are forthcoming. As described above, that is not yet

known. Regardless, the Draft PEIR that covers the Draft UCP Update notes that value standards are not intended to be applied to open space parks such as Rose Canyon. *See* Draft PEIR p. 4.13-5.

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

To reflect these MSCP requirements, text on following pages of the Draft UCP should be amended:

- Page 124: "Open Space Canyons are City-owned lands located throughout the City, consisting of canyons, mesas, and other landforms. Most of the open space canyons are MSCP habitat preserves and have specific conditions for public access and type of use. This open space is intended to preserve and protect native plants and animals, while providing for compatible public access and enjoyment."
- Page 141: "[T]he approximately 8,676-acre University community area supports a variety of vegetation communities and land cover types in its open space including both upland and wetland vegetation communities. The majority of these open space areas are subject to compliance with the City's MSCP Subarea Plan where ~~preservation balances the protection of~~ natural resources must be preserved, with the allowance of public passive recreation only where compatible with that mandate."

A. SANDAG's Antiquated Bike Network Trail Should be Removed from the UCP. The City Council specifically removed it from the City's Bicycle Master Plan Update in 2013. It has been superseded by the City's Gilman Dr. Coastal Rail Trail (CRT) project.

UCP Figure 20 (Bicycle Network Map) contains an outdated reference to a previous alignment of the Coastal Rail Trail (CRT). Attachment 1 is Figure 3-3 from SANDAG's 2021 Regional Plan, which incorrectly notes the CRT alignment on the north side of Rose Canyon (Trail ID #11) instead of identifying the "Gilman Connector" (Trail ID #17) as the official CRT alignment. This is an old alignment for the Coastal Rail Trail (CRT) project was proposed by SANDAG over 20 years ago. This alignment was later rejected by the City in 2013 when the City Council voted unanimously to remove the Rose Canyon and Roselle Canyon from the 2012 Bike Master Plan Update. (See Attachment

2, City Council Resolution 308597, approved unanimously, including by then Councilmember and Interim Mayor Todd Gloria).

In 2015, the City chose Gilman Dr as the alignment for the CRT in accordance with the process identified for each city to "plan, design and construct segments of the trail within their respective jurisdictions."[1] The City has since completed final design and environmental review of the CRT project, and has partially funded construction. The Draft UCP correctly shows the Gilman Drive alignment of the Coastal Rail Trail on pages 90-91, so the old SANDAG proposed alignment through Rose Canyon and Roselle Canyon included on Figure 20 should be removed. This is especially important since much of the old Rose Canyon and Roselle Canyon alignment is through MSCP habitat, including critical habitat for Spreading navarretia as shown in the Impacted Listed Plant Species table in the 2021 Regional Plan.

II. New and Amended Draft Policies

In addition to removing proposed trails from the exhibits throughout the UCP, there are also additional language and policy considerations that should be addressed in the UCP. We provided these comments on the March 2024 Draft UCP, but changes were not made to the Final UCP. The suggested policy changes include:

A. Proposed New Policies Related to Trails

The following policies should be added to the Draft UCP to make it clear that the City intends to follow its own guidance related to considering new trails:

- "New and formalized trails for passive recreation in Rose Canyon and other MSCP lands will only be considered after sustained habitat conservation and MHPA/MCSP compliance is demonstrated. New trails will be located and designed so as not interfere with the primary purpose of Rose Canyon and other MSCP lands as open space for the preservation of sensitive habitat areas."

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

[1] Coastal Rail Trail information on City of San Diego website: https://www.sandiego.gov/cip/projectinfo/featuredprojects/railtrail

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

  Background: The existing trails within Rose Canyon and other MSCP lands experience constant degradation and the construction of new, illegal trails for mountain-biking that are damaging and destroying sensitive resources. The City's Open Space Division is so underfunded, there is very limited monitoring of illegal uses or enforcement within the MHPA boundaries to prevent habitat damage and impacts to wildlife, even as those impacts have greatly increased. The MSCP Subarea Plan states that "[W]here land is preserved as part of the MSCP through acquisition, regulation, mitigation or other means, management is necessary to continue to ensure that the biological values are maintained over time, and that the species and habitats that have been set aside are adequately protected and remain viable. The City will be responsible for and will continue the management and maintenance of its existing public lands (including those with conservation easement), at current levels. The City will also manage and maintain lands obtained as mitigation where those lands have been dedicated to the City in fee title or easement, and land acquired with regional funds within the City's MHPA boundaries." *See* MSCP Subarea Plan at 49. Furthermore, the MCSP Subarea Plan lists the following as one of the General Management Directives: "Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/maintenance as needed." *See* MSCP Subarea Plan at 52. Open space park resources for monitoring and enforcement and habitat protection in Rose Canyon are far below what is needed.

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

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

sensitivity in those locations." *See* MSCP Subarea Plan at 52. This proposed UCP policy reiterates and restates anew this important guidance.

B. Proposed Revisions to Policies Related to Trails

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

- Policy 2.9C: Developments that are adjacent to MHPA lands or other natural open space must provide signage that informs people of the location of official access points for trails and that clearly prohibits unauthorized access into the adjacent open space. Signs should also provide information about the local native plant and animal species and that San Diego is a biodiversity hot spot. ~~Where possible and permitted by governing codes and regulations, developments that are adjacent to natural open space should provide multi-use trails for hiking, bicycling, jogging, and other uses so that residents can access and appreciate the open space.~~
- Policy 2.9D: Orient the narrow end of buildings toward the open space. ~~Encourage design strategies to maximize views from development to open spaces, such as orienting buildings to open space areas and/or locating common amenity areas adjacent to public open space~~. For MHPA adjacent development, common amenities that involve outdoor lighting and potential noise should ~~consider being~~be located away from the open space or other MHPA edge. Common amenities that involve outdoor lighting and potential noise ~~can also consider being~~shall be located on the other side of buildings to avoid the open space or MHPA edge.
- Policy 2.9E: For buildings that are adjacent to open space and MHPA areas, ~~promote~~ require design strategies that reduce the potential for bird strikes.
- Policy 3.1G: Enhance pedestrian and bicycle access to ~~open space lands, natural recreational areas, and~~ developed parks by improving connectivity and increasing awareness of ~~trails and other~~ pedestrian pathways and on-street bike routes as complementary components of the community's circulation network via signage, wayfinding programs, and educational kiosks. *(Note: Reason for this change: The MSCP does not recognize being part of a circulation network as a purpose for*

trails – their primary purpose is habitat protection with passive recreation "conditionally compatible".)

- Policy 3.3A: Provide a continuous bicycle network of safe, convenient, and attractive bikeways on streets and through developed areas throughout the University Community, with an emphasis on low stress connections between the southern neighborhoods and destinations in the northern portion of the community, as well as to schools, parks, mixed-use and employment villages, commercial centers, transit stations and mobility hubs.
- Policy 3.3C: Support a comprehensive network by implementing bikeways that facilitate interconnectivity with the UC San Diego's bicycle network, the regional bicycle network, and on-street bike routes to ~~trails, and~~ other communities. *(Note: MSCP lands are not part of the regional bicycle network.)*
- Policy 4.1C: Establish an integrated public realm framework of connected sidewalks, urban pathways, ~~trails,~~ paseos, plazas, connections at multimodal mobility hubs, and parks like linear and pocket parks.
- Policy 4.1K: Provide open space linkages in compliance with MHPA goals and policies~~where appropriate~~, including trailheads for bike and pedestrian access with appropriate, visible, and clearly marked entrances and regulations.~~.~~
- Policy 4.1T: Promote a coordinated design theme for the University Community throughout different neighborhoods. For example, create a consistent trailhead marker with similar text, logo and resource materials. MSCP rules and regulations should be included at trailheads into MHPA lands.
- Policy 4.2A: Promote open space conservation of natural lands~~,~~. P~~and p~~rovide open ~~space linkages where appropriate~~, overlooks, trail heads and bike/pedestrian access with appropriate, visible, and clearly-marked entrances where appropriate and in conformance with MCSP and MHPA guidelines.
- Policy 4.2C: Through the Citywide Trails Master Plan process, examine locations where neighborhoods and communities can be connected to adjacent parks and trails (if in conformance with MCSP and MHPA guidelines).~~Connect adjacent communities to trails and trail-adjacent parks by extending existing trails or providing new ones.~~
- ~~Policy 4.2E: Re-vegetate graded slopes adjacent to natural hillsides and canyons with native, drought tolerant, and fire-resistive species to improve drainage conditions, reduce slope erosion and instability, and restore biological diversity.~~

(Note: Future Natural Resource Management Plan(s) will determine best practices – this language is premature in the UCP.)

- Policy 5.1A: Promote open space conservation of natural lands and provide open space linkages ~~(where appropriate)~~, trailheads and bike/pedestrian access with clearly marked entrances where appropriate and in conformance with MCSP and MHPA guidelines.
- Policy 5.1B: Connect open space trails with major canyons, neighborhood parks, schools and private open space areas where feasible and where appropriate and in conformance with MCSP and MHPA guidelines. The proposed trail system is illustrated in Figure 27.
- Policy 5.1C: Provide opportunities for public access to open space, including portions of the MHPA, through low impact recreation, scenic overlooks, environmental education and research where appropriate and in conformance with MCSP and MHPA guidelines.
- ~~Policy 5.1E: Connect adjacent communities to trails and trail-adjacent parks by extending existing trails or providing new ones~~ *(Note: Suggest deleting – repetitive and same as Policy 4.2C)*
- Policy 5.2B: ~~Support minimizing~~Minimize the visual, noise, and lighting-related impacts of new development to canyons.
- Policy 5.2C: ~~Minimize and evaluate the use of~~Require that night lighting along the canyons and adjacent to sensitive habitat areas be ~~,~~ consistent with MHPA Adjacency Guidelines, ESL regulations, and Outdoor Lighting regulations. Lights should be full shielded and directed away from the MHPA.
- ~~Policy 5.13I: Consider the topography, vegetation and scenic value of Rose Canyon for future uses. Passive recreational uses are recommended rather than active uses requiring major grading and construction. Protect and restore Rose Canyon Open Space Park for education, research, stewardship, and passive recreation.~~ *(Note: Suggest deleting – adds no value and "for future uses" is confusing.)*
- ~~Policy 5.13J: Pursue an open space easement with access along the north side of the AT & SF Railroad between I-5 and I-805.~~ *(Note: Suggest deleting – most of the land is either railroad right of way or on private property and infeasible.)*

C. Policies Related to Canyon-Adjacent Setbacks and Building Transitions

The Community Discussion Draft of the UCP published in April 2023 contained more appropriate language to guide canyon-adjacent building design. Page 48 in the Discussion Draft UCP stated: "Development *should* recognize the value of this open space to both support habitat and wildlife and serve as a community resource. This can be accomplished by designing site improvements to minimize development's impact to the open space and to steep hillside areas (see Figure 10). *Buildings adjacent to and facing canyons in the community should step back from the canyon edge with terraces and upper story stepbacks. Wherever possible, the long side of the building should face inward and away from the canyon open space.* Reflective glazing that produces glare and light onto the canyon should be avoided, and *buildings should be articulated* with a pattern of forms and massing that provides a diverse and varied façade along the open space edge. Public access to open space should be maintained with paseos, paths, terraces, and other openings in the development along the canyon edge." (italics added for emphasis). Figure 10 in the Discussion Draft UCP (Canyon-Adjacent Building Design) identifies that buildings should be set back a minimum of 50' from the canyon rim, that the tallest portion of the building should be further from the canyon rim, and that the building should provide upper story setbacks.

However, the Draft UCP backslides and removes all standards, instead providing permissive language in the text and as notes to Figure 11 (Canyon-Adjacent Building Design): Page 56 of the Draft UCP states "*Development is best when* it is designed to recognize the value of open space in supporting habitat and wildlife and serving as a community resource. This *can be accomplished by* designing site improvements to minimize the impact of development to open space and to steep hillside areas. The Community Plan *envisons* development adjacent to and/or face canyon open space areas with buildings that locates the tallest portion of buildings furthest from the canyon rim, incorporates a setback from the canyon edges, and steps back upper story levels as illustrated in Figure 11. Building facades with varied design features *can help to minimize* the potentiate for bird strikes. Outdoor lighting that is shielded, directed downward, and faced away from canyon edges *can help to reduce* reflective glazing that produces glare and light onto the canyon. Development with paseos, paths, terraces along the canyon edge *has the opportunity to* provide public access and views points to open space." (italics added for emphasis). In addition to the shift from prescriptive language to permissive language, reference to building orientation along the canyon rim and having the long side face away from the canyon has been removed. Furthermore, Figure 11 has been amended to remove all "shoulds" and it now the notes simply state observations of the building illustrated, how it is setback from the canyon rim, how the upper story is set back, and how the tallest portion of the building depicted is located furthest away from

the canyon rim. The text and Figure 11 do not require anything, they simply acknowledge a number of design elements that could be incorporated.

This is poor policy all around that does not reflect current City policy contained in the supplemental development regulations identified in the Draft UCP (starting on page 187). The setback requirement should be restated and the requirement for a gradual building transition should be reinstated as well. Policies with flexible language such as "encourage", "promote", and "where possible", occasionally have their place, but this is not one. The text on page 56 of the May 2024 Draft UCP and on Figure 11 should be revised to revert to the text and Figure 10 from the Discussion Draft UCP published in April 2023. Additionally, Figure 35 (Community Plan Implementation Overlay Zone) should be updated to reflect that Canyon-Adjacent Supplement Development Regulations should apply to all properties adjacent to Rose Canyon.

The Discussion Draft included a section of Area-Specific Supplemental Design Regulations that were removed from the Draft UCP and should be added back in:

Canyon-Adjacent Development

> The purpose and intent of these supplemental development regulations are to provide design regulations to lessen the effect of buildings developed adjacent to open space areas designated in this community plan.
>
> SDR-21 Building Design abutting Open Space: Development on sites directly abutting an open space area designated in this community plan shall conform with the following requirements:
>
> a) For a premises greater than 300-feet in depth from the street, provide a 50-foot building setback from the open space area.
>
> b) Provide a 15-foot upper story stepback at least 50 feet above the ground level for the portion of the building fronting the open space area.
>
> c) Orient the short ends of buildings toward the open space areas or break down the length of façades facing the open space areas with articulation in the form of one 4-foot offset in the building plane for every 50 feet of façade length.
>
> d) The use of highly reflective and mirrored glazing is not permitted fronting open space areas.

Furthermore, the policies below should be modified:

- Policy 2.9A: Encourage context-sensitive design by stepping back from the canyon edge and orienting the short end(s) of building(s) perpendicular to the canyon edge. Context-sensitive design shall incorporate the setback, step-back, and building height transition requirements of Canyon-Adjacent Supplement Development Regulations including SDR -C.2 and SDR-21 (or as appropriately renumbered once added back into the Draft UCP).
- Policy 2.9B: ~~Promote design strategies that reduce light and glare on building frontages facing canyons and open space.~~ Design buildings to eliminate light and glare on building frontages facing canyons and open space.
- Policy 2.9E: For buildings that are adjacent to open space and MHPA areas, ~~promote~~ require design strategies that reduce the potential for bird strikes.

III. Zoning and Graphic Inconsistencies On Properties in the UCP Area That Should be Remedied

The zoning districts for the following properties in the UCP boundary should be corrected to accurately reflect the actual uses and land use designations as well as to protect open space MSCP lands in the UCP area. Through implementation of the adopted University Community Plan, the zoning corrections should be made as follows:

Towne Centre Drive – Roselle Canyon – Sorrento Headlands area.

The zoning at the north end of Towne Centre Drive should be updated to reflect existing conservation agreements and conditions on the city owned MSCP lands in this area. This parcel is incorrectly shown in the IP 1-1 (Prime Industrial) zone. Zoning should be corrected from IP1-1 to OP 2-1 or OC 1-1 on the 5-acre, city owned conservation/MSCP parcel (APN: 343-121-38), which is situated just north of Towne Centre Drive. This parcel was specifically deeded to the city in 1998 with a conservation deed "to be preserved as permanent open space in the city's MHPA" (see R-290280, 6/16/98, p 4) as part of the approval of the Eastgate Acres project. It has been 100% conserved in the MHPA since 1998, and its zoning should reflect this status.

"Pueblo Lands Central and South"), managed by the Public Utilities Department.

The current zoning for these lands today is RS 1-14, which is not accurate, but which has helped to maintain them in undeveloped open space. The Draft UCP proposes to zone

these two parcels IL-2-1 (Light industrial). The proposed zoning for these parcels should be OC 1-1, OP 2-1, or AR in recognition of their critical environmental status. Pueblo Lands "central" (north of Nobel Dr) and "south" (south of Nobel Dr) comprise 71 acres of environmentally sensitive, city-owned land between I-805 and sensitive habitat areas in MCAS Miramar. They include two city-owned parcels in mixed conservation status managed by the Public Utilities Department. The largest part of these parcels in the MCAS Airport Transition Zone, which limits development potential due to crash safety potential. The Pueblo Lands Central parcel (north of Nobel) is shown in Data Basin as 100% conserved MHPA land. IL 2-1 Zoning for Pueblo lands central (north of Nobel Dr), in particular, is not consistent with this MSCP status. The Pueblo Lands South parcel (south of Nobel Drive) is also being used for habitat mitigation and grassland restoration in mitigation for the PURE Water project. The parcels comprise critical links in the MSCP identified wildlife corridor connecting habitat cores in Rose Canyon OS Park, MCAS-Miramar, and Mission Trails Regional Park with lands connected to the Penasquitos watershed.- Open Space zoning for the parcels would be consistent with the proposed Land Use Designations for these parcels, shown on page 33 of the Draft UCP, and consistent with UCP Policy 5.13G: "Retain the areas influenced by MCAS Miramar activities as open space per the existing fee ownership of the Federal Government in the interest of public health, safety and welfare."

Need to correct the location of MSCP Core Biological Resource Area Corridor.

Figure 29 incorrectly identifies the MSCP Core Biological Resource Area Corridor running north/south on the wrong side of I-805. It should be on the east side of I-805, where there is open space (the west side is developed). This is important – especially in combination with rezoning the "Pueblo lands Central and South" east of I-805 that comprise this wildlife corridor to Open Space.

IV. The UCP Suddenly Includes Widening Genesee Ave From Four to Six Lanes.

UCP Appendix Table 5, Planned Street Classification Modifications, was modified between the Draft UCP (published in March 2024) and the May 2024 UCP to identify Genesee Avenue as a six-lane prime arterial. This would involve widening Genesee Ave from Nobel Drive to the SR 52 interchange and increasing the street from a four-lane to six-lane road along its length, a portion of which crosses Rose Canyon. However, the UCP offers no additional information on how this widening would be accommodated – in particular the part of Genesee that bridges Rose Canyon. In 2015, the City completed a full EIR to remove a previously-conceptualized bridge and widening of Genesee Ave.

from the UCP. At that time, City staff informed the City Council explicitly that removing the bridge and widening was the first step in updating the UCP. This proposed change to Table 5 of the UCP to include widening Genesee to six lanes between Nobel and SR-52 must absolutely be removed.

V. Planning Commission Action on the UCP and Final PEIR

One of the actions identified for Planning Commission consideration on May 30, 2024 includes recommending certification of Program Environmental Impact Report (SCH No. 2021070359) prepared for the proposed comprehensive update to the UCP. However, the Final PEIR has not yet been published, is not available for public review, and is not available for Planning Commission review and consideration. A Final EIR is made up of a Draft EIR (in this case, published in March 2024) plus the Response to Comments, any errata, and any supplemental information determined to be needed by the comments received on the DEIR. In the case of the UCP (and larger Blueprint San Diego), only the Draft EIR portion of the Final EIR exists – none of the other components of the Final EIR are yet available. The Planning Commission cannot review the Response to Comments, any supplemental information, or any modifications to the DEIR that will be forthcoming and yet is still recommending certification of this document. It is poor policy for the Planning Commission to be in the position to recommend certification of an EIR it has never seen.

VI. Conclusion.

The process to draft, refine, and come to a recommendation on the UCP has been a multi-year process with stakeholders across the spectrum. Friends of Rose Canyon appreciates the City's attention to the importance of preserving the sensitive resources in the UCP area and for removing prematurely-identified trails from the Plan's maps and exhibits. However, there are still key issues that require further amendments to the Plan. We urge the Planning Commission, and ultimately, the City Council, to adopt a UCP that addresses the comments contained in this letter.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Kristi T. Bascom, AICP

cc: Deborah Knight, Executive Director, Friends of Rose Canyon (via email)
Heather M. Minner, Partner, Shute, Mihaly, & Weinberger, LLP

Attachments:

1. SANDAG 2021 Regional Plan Figure 3-3 – Regional Bicycle Network
2. City Council Resolution 308597

1776087.1

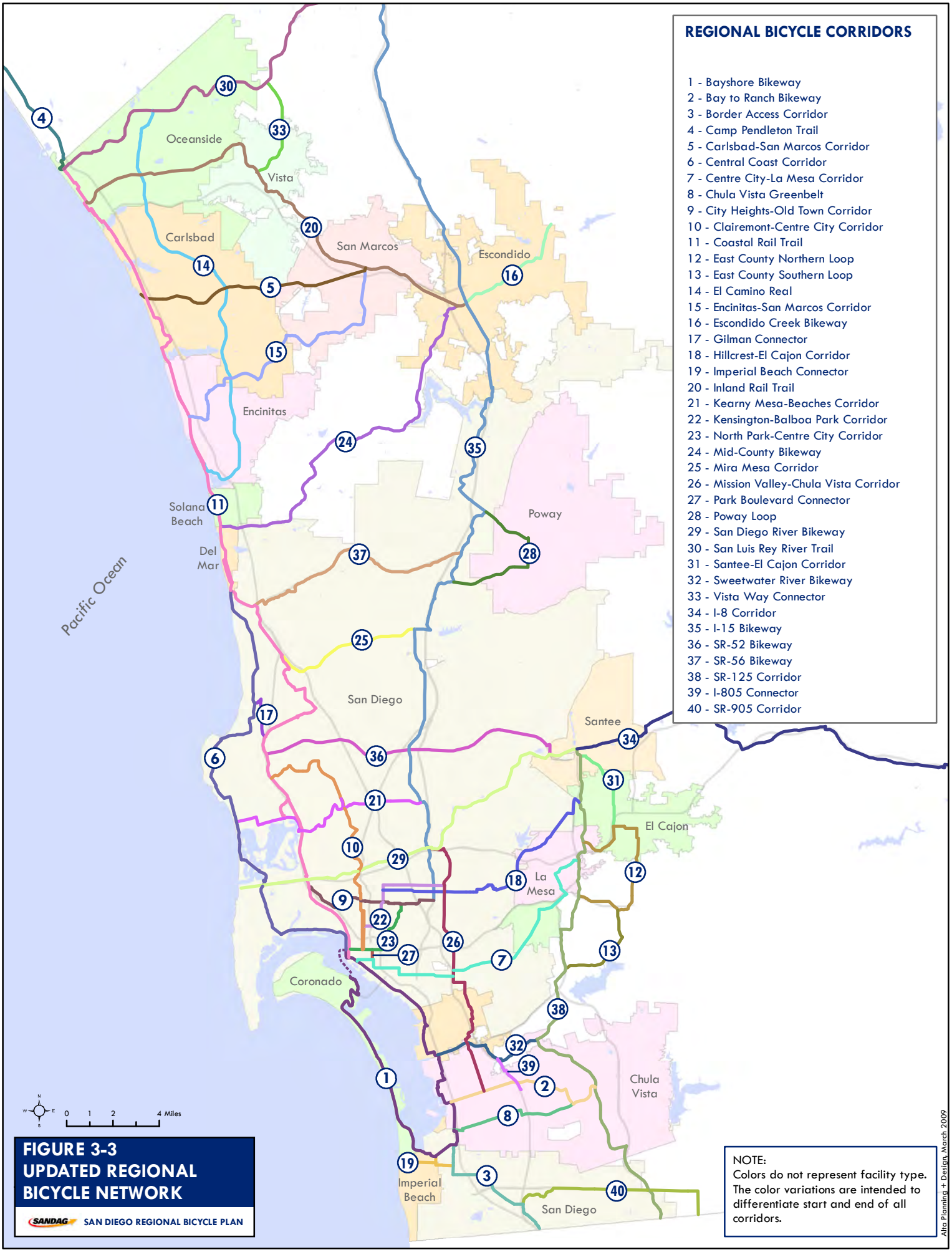

FIGURE 3-3
UPDATED REGIONAL BICYCLE NETWORK

SANDAG SAN DIEGO REGIONAL BICYCLE PLAN

#207

(R-2014-137) #B
REVISED COPY

RESOLUTION NUMBER R- 308597

DATE OF FINAL PASSAGE DEC 26 2013

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO ADOPTING THE CITY OF SAN DIEGO BICYCLE MASTER PLAN UPDATE.

WHEREAS, on May 28, 2002, the City Council of the City of San Diego approved Resolution No. R-296581, adopting the City of San Diego's Bicycle Master Plan; and

WHEREAS, the City of San Diego Bicycle Master Plan Update provides direction for expanding the existing bikeway network, connecting gaps, providing for improved local and regional connectivity, and encouraging bicycling as a transportation mode; and

WHEREAS, on July 25, 2013, the Planning Commission of the City of San Diego considered the City of San Diego Bicycle Master Plan Update, and pursuant to Planning Commission Resolution No. 4535-PC, the Planning Commission voted to recommend City Council adopt the City of San Diego Bicycle Master Plan Update, certify the Environmental Impact Report No. 290781 and adopt the Findings, Statement of Overriding Considerations and Mitigation, Monitoring and Reporting Program No. 290781. In addition, the Planning Commission recommended that the Findings of Fact and Statement of Overriding Considerations be revised to include additional language to balance vehicular level of service goals with bicycle network expansion goals, and include complete streets language in the project benefits; and

WHEREAS, on December 9, 2013, the City Council of the City of San Diego held a public hearing for the purpose of considering the adoption of the City of San Diego Bicycle Master Plan Update; NOW, THEREFORE,

BE IT RESOLVED, by the City Council of the City of San Diego, that the Council adopts the City of San Diego Bicycle Master Plan Update as amended to remove the Rose Canyon and Roselle Canyon segments, a copy of which is on file in the office of the City Clerk as Document No. RR- 308597.

BE IT FURTHER RESOLVED, that the City Attorney's Office and staff are directed to come back within 30 days with appropriate language regarding a proposed bicycle advisory committee.

APPROVED: JAN I. GOLDSMITH, City Attorney

By _____
Corrine L. Neuffer
Deputy City Attorney

CLN:dr:als
11/21/13
12/11/13 Revised
Or.Dept:DSD
Doc. No. 631945_2

I hereby certify that the foregoing Resolution was passed by the Council of the City of San Diego, at this meeting of DEC 09 2013.

ELIZABETH S. MALAND
City Clerk

By _____
Deputy City Clerk

Approved pursuant to Charter section 265(i):

_____ _____
(date) TODD GLORIA, Council President

Passed by the Council of The City of San Diego on DEC 09 2013, by the following vote:

Councilmembers	Yeas	Nays	Not Present	Recused
Sherri Lightner	☑	☐	☐	☐
Kevin Faulconer	☑	☐	☐	☐
Todd Gloria	☑	☐	☐	☐
Myrtle Cole	☑	☐	☐	☐
Mark Kersey	☑	☐	☐	☐
Lorie Zapf	☑	☐	☐	☐
Scott Sherman	☑	☐	☐	☐
David Alvarez	☑	☐	☐	☐
Marti Emerald	☑	☐	☐	☐

Date of final passage DEC 26 2013.

(Please note: When a resolution is approved by the Council President as interim Mayor, the date of final passage is the date the approved resolution was returned to the Office of the City Clerk.)

AUTHENTICATED BY:

TODD GLORIA, COUNCIL PRESIDENT
as interim Mayor of The City of San Diego, California.

(Seal)

ELIZABETH S. MALAND
City Clerk of The City of San Diego, California.

By _____, Deputy

Office of the City Clerk, San Diego, California

Resolution Number R- 308597

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Of Counsel
MARC D. JOSEPH
DANIEL L. CARDOZO

May 29, 2024

Via Webform, Email, and Overnight Mail

Chair Kelly Modén
Vice-Chairperson Matthew Boomhower
Commissioner Ted Miyahara
Commissioner Farah Mahzari
Commissioner Dennis Otsuji
Commissioner Ken Malbrough
San Diego Planning Commission
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Planning Commission Public Comment Webform:
https://www.sandiego.gov/planning-commission/agenda-comment-form

Re: Agenda Item 3 – University Community Plan Update (PC-24-023)

Dear Chair Modén, Planning Commissioners, Planning Director Vonblum:

We are writing on behalf of San Diego Residents for Responsible Development ("Residents") regarding Agenda Item No. 3, the University Community Plan Update (PC-24-023) ("Plan Update")[1] prepared by the City of San Diego ("City"). The Plan Update will be considered at the Planning Commission hearing on May 30, 2024 for recommendation to the City Council.[2] The University Community (also referred to as "University City") encompasses the area east of La Jolla and north of Clairemont Mesa, with the 805 Freeway and the 5 Freeway

[1] City of San Diego, University Community Plan and Local Coastal Draft Plan (May 2024). Available at https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usrfiles.com/ugd/bf5c85_3865c25361004831aa670bd9776df2e9.pdf (hereinafter "Community Plan").
[2] City of San Diego, Report to the Planning Commission, University Community Plan Update Report No. PC-24-023 (May 30, 2024). Available at: https://www.sandiego.gov/sites/default/files/2024-05/pc-24-023-university_cpu_sr_pc_hearing.pdf (hereinafter "Staff Report").

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bisecting the Community Plan Area and the 52 Freeway serving as the southern border of the Plan Area. The University Community Plan Area encompasses University of California San Diego.

Staff recommends that the Planning Commission recommend to the City Council to: 1) approve the resolution adopting the comprehensive update to the University Community Plan, rescinding the Nexus Technology Specific Plan, and amending the community's Local Coastal Program and the General Plan; 2) approve an ordinance amending the San Diego Municipal Code Chapter 13, Article 2, Division 14 and amending the City's certified Local Coastal Program; 3) approve an ordinance amending the Historical Resources Guidelines of the City's Land Development Manual to exempt specified areas within the University Community Planning Area from potential historic resource review under SDMC 143.0212; 4) approve an ordinance dedicating public open space within the University Community Planning Area; 5) approve an ordinance rezoning land within the University Community Planning Area consistent with the University Community Plan.[3]

The draft Plan Update was released for public review between March 14, 2024, and April 29, 2024.[4] The City prepared a Draft Program Environmental Impact Report ("DPEIR") for the Plan Update. The public review period to comment on the DPEIR ended on April 29, 2024.[5] The City is preparing but has not yet released, a Final PEIR with responses to comments.[6] The City has therefore not completed its environmental review of the Plan Update pursuant to the California Environmental Quality Act ("CEQA").[7]

On March 27, 2024, BIOCOM California ("BIOCOM") submitted a letter requesting that the City "adopt Urban Flex and Prime Flex land use designations and the EMX-1 zone in an area of the North Torrey Pines mesa."[8] This land use designation and zone change is not proposed in the Plan Update and was not analyzed in the DPEIR or Planning Commission Staff Report. Rather, the Staff Report explains that the Plan Update proposes two Employment Mixed Use Zones ("EMX"), EMX-2 and EMX-3, in addition to the proposed Residential Mixed Use

[3] Staff Report, p. 1.
[4] Staff Report, p. 17.
[5] Staff Report, p, 2.
[6] Staff Report, p. 2.
[7] Pub. Res. Code §§ 21000 et seq.; 14 Cal. Code Regs. §§ 15000 et seq.
[8] Letter from Biocom California to City of San Diego Planning Department, University Community Plan Update (CPU) (March 27, 2024). Available at: https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usrfiles.com/ugd/bf5c85_0354b3b604ac4dfebeb54edadab74565.pdf p, 366 of 840.

("RMX") zones. The proposed EMX-2 and EMX-3 zones are being used to implement the Urban Employment Village land use designation, and would allow non-residential development as a primary use and a secondary use that is either non-residential or residential.[9] Both zones limit the size and floor area ratio ("FAR") of proposed developments. BIOCOM's proposal to adopt EMX-1 zoning would result in an increased development footprint in these areas which was not analyzed in the DPEIR. It would be premature for the Planning Commission to make a determination on BIOCOM's proposed land use and zoning change before adequate environmental analysis is conducted in a revised and recirculated Draft Program EIR.

Residents respectfully requests that the Planning Commission remand the Plan Update Project to Staff revise the Community Plan and recirculate the Draft Program Environmental Impact Report SCH No. 2021070359 prepared for the Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update ("DPEIR") [10] to address the Community Plan's potentially significant environmental before recommending the Community Plan be approved by the City Council. These comments demonstrate that the Community Plan and DPEIR fail to adequately analyze the alternative proposed by BIOCOM to revise the Community Plan to adopt Urban Flex and Prime Flex land use in the EMX-1 zone in the North Torrey Pines area.[11] We reserve the right to supplement these comments at a later date and at any future proceedings related to this Project.[12]

I. STATEMENT OF INTEREST

Residents is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards and environmental impacts of the Project. The association includes the International Brotherhood of Electrical Workers Local 569

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[9] Staff Report, p. 12.
[10] City of San Diego, Draft Program EIR Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update ("DPEIR") (March 14, 2024). Available at: https://www.sandiego.gov/sites/default/files/2024-03/draft_peir_blueprint-sd-initiative-hillcrest-fpa-university-cpu_0.pdf
[11] Letter from Biocom California to City of San Diego Planning Department, University Community Plan Update (CPU) (March 27, 2024). Available at: https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usrfiles.com/ugd/bf5c85_0354b3b604ac4dfebeb54edadab74565.pdf p, 366 of 840.
[12] Gov. Code § 65009(b); PRC § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* ("*Bakersfield*") (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist*. (1997) 60 Cal. App. 4th 1109, 1121.

("IBEW 569"), its members and their families who live, work, and recreate in San Diego.

Residents and its members may be adversely affected by the potential environmental, land use, public health and public service impacts associated with the Plan Update. Accordingly, they would be directly affected by the its environmental, land use, and health and safety impacts. Individual members may also work on the Plan Update buildout. They would be first in line to be exposed to any health and safety hazards that exist onsite.

Residents seeks to ensure a sustainable construction industry over the long-term by supporting projects that have positive impacts for the community, and which minimize adverse environmental and public health impacts. Residents has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for business and industry to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

II. LEGAL BACKGROUND

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project.[13] "Its purpose is to inform the public and its responsible officials of the environmental consequences of their decisions before they are made. Thus, the EIR 'protects not only the environment but also informed self-government.'"[14] The EIR has been described as "an environmental 'alarm bell' whose purpose it is to alert the public and its responsible officials to environmental changes before they have

[13] Public Resources Code § 21061; 14 C.C.R. §§ 15002(a)(1); 15003(b)–(e); *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 517 ("[T]he basic purpose of an EIR is to provide public agencies and the public in general with detailed information about the effect [that] a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project.").
[14] *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564, *quoting Laurel Heights*, 47 Cal.3d at 392.

reached ecological points of no return."[15] As the CEQA Guidelines explain, "[t]he EIR serves not only to protect the environment but also to demonstrate to the public that it is being protected."[16]

While courts review an EIR using an "abuse of discretion" standard, "the reviewing court is not to 'uncritically rely on every study or analysis presented by a project proponent in support of its position. *A clearly inadequate or unsupported study is entitled to no judicial deference*."[17] As the courts have explained, a prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process."[18] "The ultimate inquiry, as case law and the CEQA guidelines make clear, is whether the EIR includes enough detail 'to enable who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.'"[19]

Recirculation of an EIR prior to certification is addressed in CEQA § 21092.1, and CEQA Guidelines §15088.5. "When significant new information is added to an environmental impact report after notice has been given pursuant to Section 21092 … but prior to certification, the public agency shall give notice again pursuant to section 21092, and consult again pursuant to Sections 21104 and 21153 before certifying the environmental impact report."[20] "Significant new information" may include a new significant environmental impact, a substantial increase in the severity of an environmental impact, a project alternative or mitigation measure that is considerably different from others previously analyzed, or a situation where

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[15] *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810; see also *Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal.App.4th 1344, 1354 ("*Berkeley Jets*") (purpose of EIR is to inform the public and officials of environmental consequences of their decisions *before* they are made).
[16] 14 C.C.R. § 15003(b).
[17] *Berkeley Jets*, 91 Cal.App.4th 1344, 1355 (emphasis added), *quoting Laurel Heights*, 47 Cal.3d at 391, 409, fn. 12.
[18] *Berkeley Jets*, 91 Cal.App.4th at 1355; see also *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722 (error is prejudicial if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process); *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1117 (decision to approve a project is a nullity if based upon an EIR that does not provide decision-makers and the public with information about the project as required by CEQA); *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 946 (prejudicial abuse of discretion results where agency fails to comply with information disclosure provisions of CEQA).
[19] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 516, *quoting Laurel Heights*, 47 Cal.3d at 405.
[20] PRC § 21092.1.

the draft EIR was so fundamentally inadequate and conclusory in nature that meaningful public review and comment were precluded.[21]

III. THE BIOCOM LAND USE ALTERNATIVE IS OUTSIDE THE SCOPE OF THE PROPOSED PLAN UPDATE AND REQUIRES RECIRCULATION OF THE DPEIR

BIOCOM's proposed land use designation and zone change is a new Plan alternative was not analyzed in the DPEIR and should not be considered by the Planning Commission at this time. It would be premature for the Planning Commission to make a determination on this land use and zoning change until adequate environmental analysis is conducted in a revised Program EIR.

BIOCOM claims, absent substantial evidence, that "making the change to Urban Flex with an EMX-1 implementing zone in the small requested area does not have a significant impact on the environmental analysis for the CPU."[22] BIOCOM provides no environmental analysis to support this assertion. The Community Plan, and the DPEIR and its appendices fail to support BIOCOM's assertion because neither the draft Plan nor the DPEIR mention, let alone analyze, BIOCOM's proposed "EMX-1", "Urban Flex" or "Prime Flex" uses.

BIOCOM offers making the change to Urban Flex with an EMX-1 implementing zone as an alternative to the Proposed Project of the DPEIR.[23] Alternatives must be thoroughly analyzed in an EIR before they can be considered for recommendation and approval. CEQA requires that an EIR must evaluate the comparative merits of alternatives in an EIR.[24] The agency is required to make an objective, good faith effort to compare the project with the alternative.[25] An EIR must contain sufficient information about each alternative to permit an evaluation of the relative merits of the alternatives and the project.[26] The analysis must contain concrete information about each alternative sufficient to allow a fact-based comparison of the alternatives with the Project.[27] An EIR's analysis of alternatives should "explain in meaningful detail" a range of alternatives to the proposed

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[21] CCR § 15088.5.
[22] *Id.*
[23] Letter from Biocom California to City of San Diego Planning Department, University Community Plan Update (CPU) (March 27, 2024). Available at: https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usrfiles.com/ugd/bf5c85_0354b3b604ac4dfebeb54edadab74565.pdf p, 366 of 840.
[24] 14 CCR § 15126.6(a).
[25] *Residents Ad Hoc Stadium Comm. v Board of Trustees* (1979) 89 CA3d 274, 286.
[26] 14 CCR § 15126.6(a).
[27] *Id.* at § 15126.6(d).

project.[28] Information sufficient to allow an informed comparison of the impacts of the project with those of the alternatives should be provided.[29]

Here, the Planning Commission has not reviewed any evidence regarding the zone change as an alternative in the DPEIR. Any recommendation to include such a zone change, absent adequate environmental review, would constitute a prejudicial abuse of discretion, and would violate CEQA. If the Planning Commission seeks to integrate this zone change, which would potentially result in significant environmental impacts, such impacts must be analyzed in a revised Program EIR circulated for public review and scrutiny.

The adoption of Urban Flex and Prime Flex land use designation and the EMX-1 zone in the area of North Torrey Pines mesa would potentially result in significant environmental impacts that require review in an EIR. Significant environmental impacts may result from the change and must be analyzed in an EIR. The purpose of the EMX zones is to provide a mix of uses with a focus on nonresidential uses with opportunities for residential development.[30] The EMX zones allow for a broad mix of uses, including office, research and development, industrial, and retail.[31] Non-residential development shall be the primary use.[32] The secondary use can be non-residential or residential.[33] If the secondary use is non-residential, it must be a different non-residential use than the primary use.[34]

Deprioritizing the development of housing in the North Torrey Pine mesa would contravene the purposes detailed in the University Community Plan. The University Community Plan includes numerous policies to encourage the development of housing within the Plan Area, and allowing non-residential use to be the primary use under the EMX zone would contravene numerous policies including:

A) Increase the homes available to meet the diverse needs of the University Community.
B) Focus higher density housing opportunities near public transit, job centers, and within Sustainable Development Areas.

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[28] *Laurel Heights Improvement Ass'n v Regents of Univ. of Cal.* (1988) 47 C3d 376, 406.
[29] *Kings County Farm Bureau v. City of Hanford* (1990) 221 CA3d692, 733.
[30] San Diego Municipal Code 6 131.0704.
[31] San Diego Municipal Code 6 131.0704.
[32] *Id.*
[33] *Id.*
[34] *Id.*

C) Facilitate the development of homes that are affordable to a range of household income levels, sizes, and tenure patterns, including families, employees, and students.
D) Encourage affordable housing to be built on-site and make units available to meet the diverse needs of the community, including families, employees, and students.
E) Promote housing options that can be comfortably occupied by seniors, including stacked flats, units without internal staircases, and with limited stairs on external paths.
F) Encourage a diverse mix of unit sizes and types, such as three-bedroom, shopkeeper, home occupations, residential-work units, and micro-units to accommodate many lifestyles, family sizes, employees, and students.
G) Support the development of a variety of building formats to provide functional and visual diversity of housing options throughout the community while maintaining stylistic compatibility.
H) 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.
I) Provide additional affordable housing through new development within the University Community above the citywide requirement.
J) Strive to affirmatively further fair housing by providing access to services, resources, jobs, and housing opportunities within walking distance to transit.[35]

Moreover, the EMX zone allows maximum structure height of 240 feet, which far and away exceeds the coastal zone height limit of 30 feet.[36] BIOCOM may seek to avoid the coastal zone height limit and request that the California Coastal Commission certifies an amendment as a Local Coastal Program Amendment. This would contravene the purpose of the coastal zone height limit and violate CEQA. The analysis of the impacts of the zone change should be included in an EIR circulated for public review and scrutiny.

The Planning Commission cannot consider BIOCOM's proposed zoning designation and land use changes unless and until the BIOCOM alternative is fully analyzed in a revised PEIR. The Planning Commission lacks adequate information or substantial evidence to support a conclusion that such a change would not result in significant environmental impacts. The Planning Commission cannot rely on the

[35] Community Plan, p. 166.
[36] San Diego Land Development Code § 132.0505.

conclusory statements of BIOCOM in implementing BIOCOM's recommended alternative. Given the zone changes were not contemplated in the DPEIR, a recommendation by the Planning Commission to support the zone change would require recirculation of the DPEIR to adequately analyze and mitigate the impacts associated with such a zone change.

IV. CONCLUSION

For the reasons discussed above, the Planning Commission cannot consider the alternatives offered by BIOCOM because they have not been analyzed in the Draft Community Plan, the DPEIR, or in any of the appendices, and require thorough analysis before the Planning Commission can make any recommendation to City Council which might encompass the BIOCOM proposal. This will necessarily require that the DPEIR be recirculated for public review. Until the DPEIR has been revised and recirculated, as described herein, the City may not lawfully approve the Project.

Thank you for your attention to these comments. Please include them in the record of proceedings for the Project.

Sincerely,

Kelilah D. Federman

:kdf

cc. via email only
Mayor Todd Gloria (Mayortoddgloria@sandiego.gov)
Council President Sean Elo-Rivera (Seanelorivera@sandiego.gov)
Council President Pro Tem Joe LaCava (JoeLaCava@sandiego.gov)
Councilmember Kent Lee ()
Deputy Planning Director Tait Galloway (tgalloway@sandiego.gov)

NEIGHBORS for a BETTER SAN DIEGO

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

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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 stepbacks, 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.

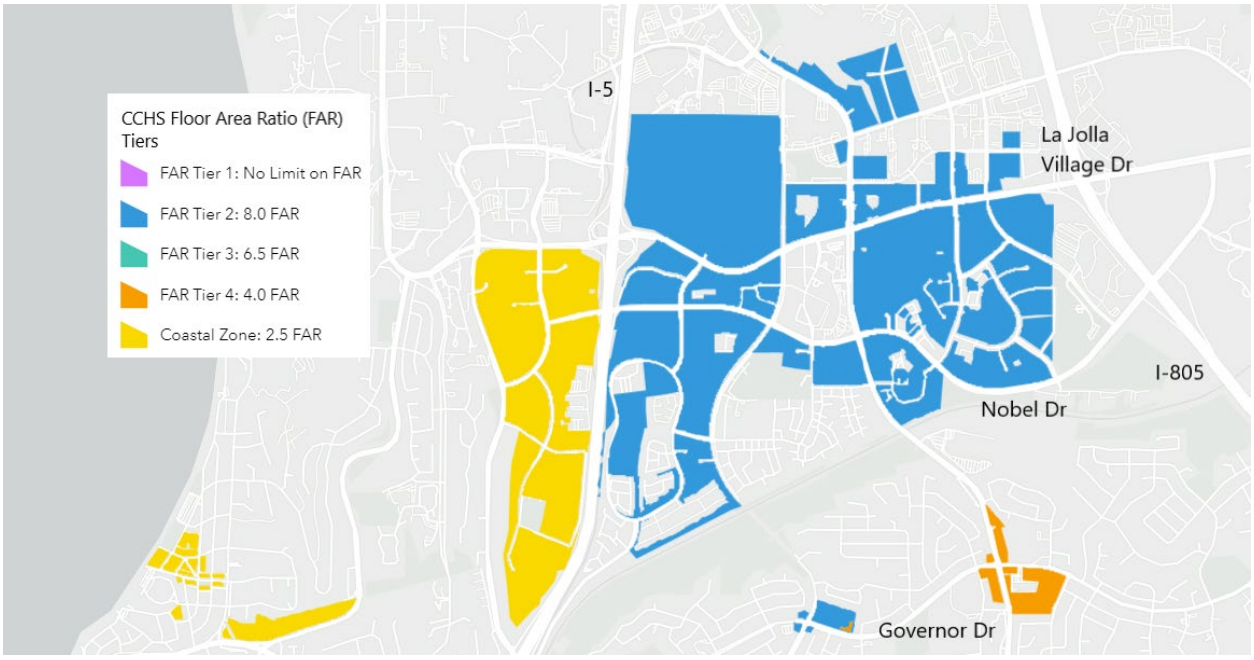


Figure A1-1. Complete Communities Floor Area Ratio Map for the University Community.

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.

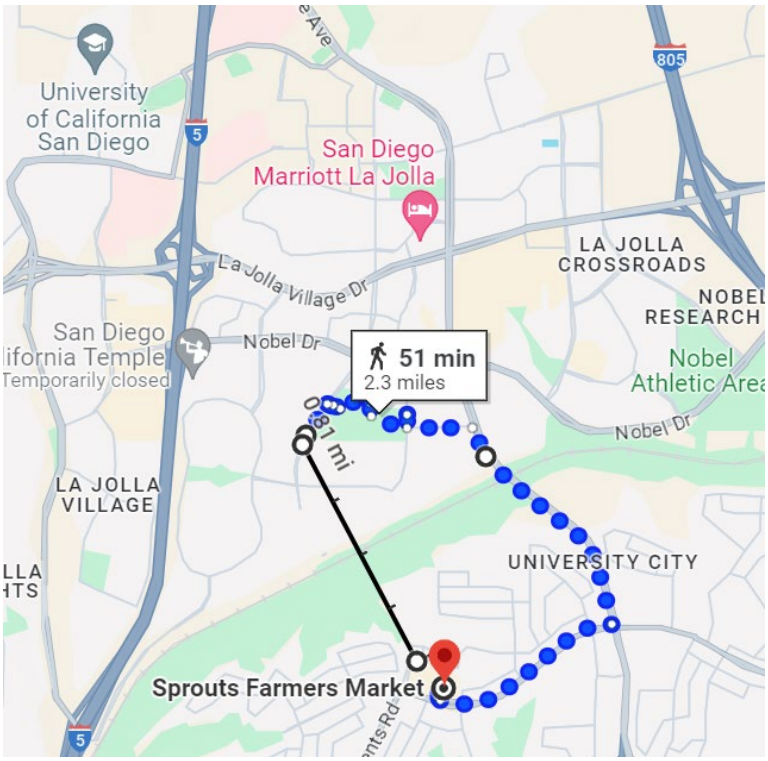


Figure A1-2. Application of CCHS Regulations to Sprouts Site

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

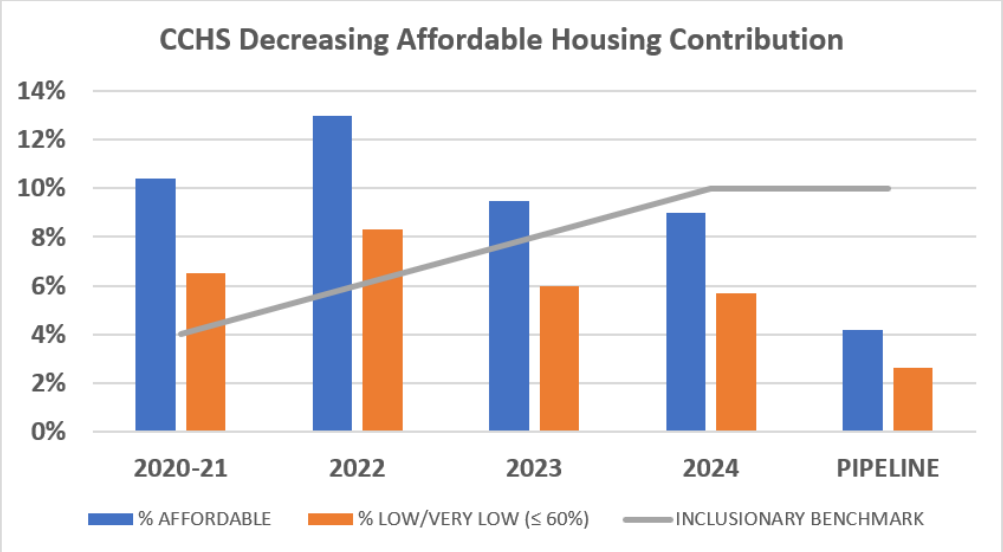
CCHS	
Affordability Requirement	40%
CCHS FAR	8
Buildable Area	2,976,000
Unit size	700
Common Space	25%
Number of Units	3,189
Lot coverage	50%
Building Height (stories)	16
Affordable Units	99
Net Affordable (% of all units)	3.1%

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.



NEIGHBORS for a BETTER SAN DIEGO

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 meets 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).

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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.

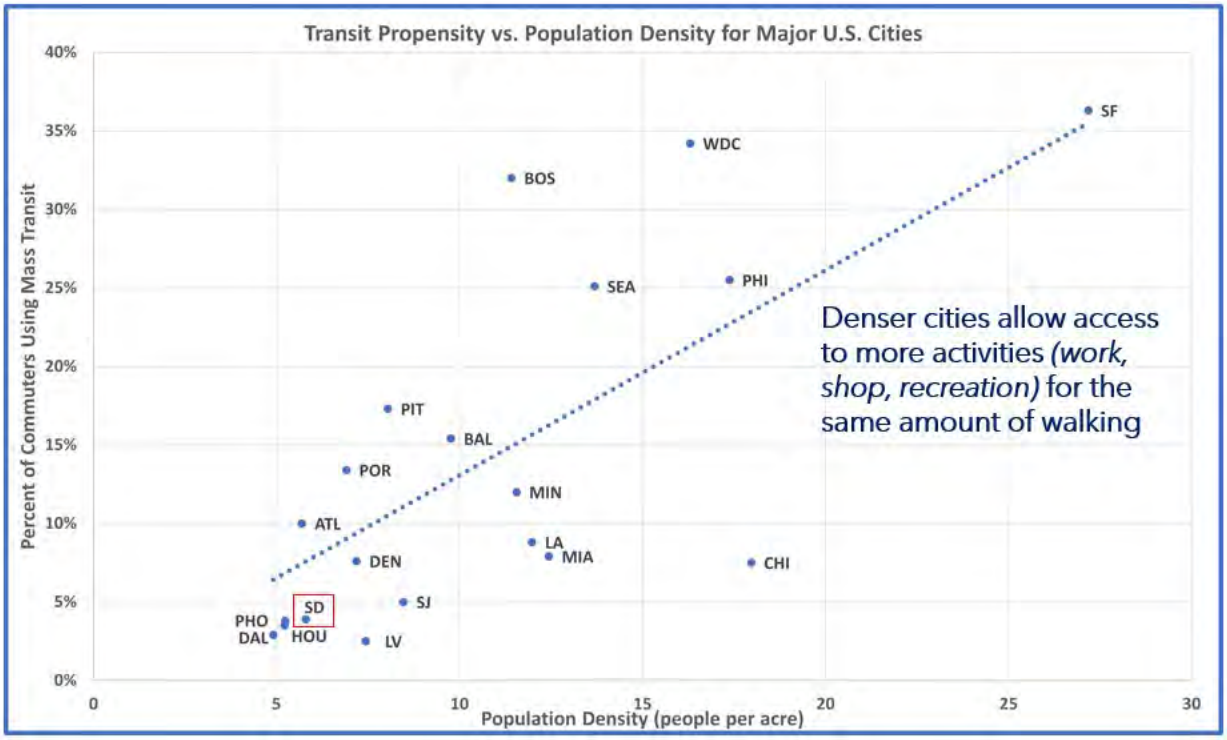
In addition to the lack of a complete analysis of the housing capacity of the bonus housing programs, the PEIR fails to analyze the impacts due to where these programs incentivize development. For example, Complete Communities Housing Solutions may be applied to parcels that exceed a threshold of 20 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
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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 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

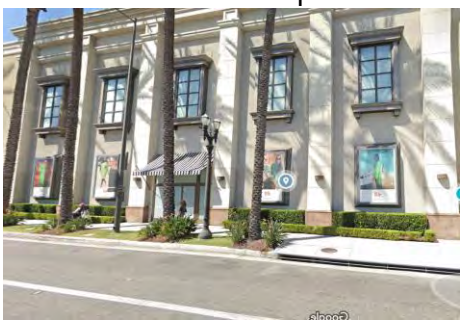
Question: Minimum required patio area required is 1,250 sf. If the minimum width and length is 20 feet by 20 feet, then could three plazas consisting of two 400 sf plazas and a 450-sf plaza satisfy the requirement? This is practical and could be supportable.

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

Amazon Obidos, corner of Mercer & Terry, Seattle

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 <u>average</u> 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: U*rban 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 of 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 <u>average</u> 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 stepback 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." (Policy2.5A.) "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]

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[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. <u>The environmental analysis for Air Quality is inadequate.</u>

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 pubic 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 50,0000 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. <u>The environmental analysis for Greenhouse Gas Emissions is inadequate.</u>

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 <u>not</u> 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 "<u>Support</u> opportunities to enhance amenities with and around transit stations . . ." and "<u>Support and encourage</u> collaboration between business and UC San Diego to incorporate [transit] . . . ." (Underline added.) Policies 3.5I and 3.5J state the Plan Update will "<u>Promote</u> public education [about transit] . . ." and "<u>Prioritize</u> transit connections . . . ." Policy 3.7A "<u>Encourage[s]</u>

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 gras 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 altneratives 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, one 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 altneratives 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 its 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 altneratives analysis.

J. <u>The City's environmental analysis of Wildfire impacts is inadequate.</u>

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

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

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

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

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. <u>The City's analysis of Growth Inducement is incorrect.</u>

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 pubic 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 Hilcrest 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. <u>The City's failure to designate an environmentally superior alternative for Blueprint SD renders the EIR inadequate for Blueprint SD.</u>

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

cc: Mayor Todd Gloria
Councilmember Joe LaCava
Councilmember Kent Lee
Suchi Lukes
Chris Nielsen
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May 21, 2024

Suchitra Lukes
City Planning Department
Sent Via Email Only To: planuniversity@sandiego.gov

Re: Draft University Community Plan

Dear Ms. Lukes:

Thank you for the opportunity to provide feedback on the draft University Community Plan/Land Use Plan Update. Given the Commission's limited staff capacity, we cannot provide an exhaustive review of the draft Community Plan or the Draft EIR, but nevertheless hope these preliminary comments and questions are useful in developing a Community Plan consistent with the requirements of the Coastal Act.

As general background, we note that in response to Commission staff recommended modifications for other community plans, City staff have indicated that the language of a plan should "reflect the nature of a community plan as a policy, rather than regulatory document." The City's community plans within the Coastal Zone, including the University Community Plan, serve as the Land Use Plan (LUP) portion of the City's Local Coastal Program, and a LUP is a critical regulatory document for managing development and land use activities along the city's coastal areas. It provides a framework for decision-making and regulation, and, in addition to the City's Implementation Plan (the Land Development Code), serves as the basis for evaluating permit applications, which includes ensuring that proposed projects align with the goals and regulations outlined in the plan. Consistency with the LUP carries at least equal weight and authority as consistency with the LDC.

Thus, while some goals may be appropriately written as aspirational, Land Use Plans/Community Plans must be sufficiently detailed, specific, and mandatory with regard to resource protection and development policies to ensure consistency with the Coastal Act. (See Pub. Resources Code, §§ 30108.5, 30200(a) and 30512.) Strict compliance with the LUP is essential for promoting sustainable coastal management and preserving the unique character and resources of San Diego's coastline. (See *Charles A. Pratt Construction Co. v. California Coastal Com*. (2008) 162 Cal.App.4th 1068, 1075-76 [LCP and the development permits issued by local governments are not solely a matter of local law, but embody state policy]).

As such, Commission staff will continue to identify and suggest modifications to language in the City's LUP amendments to implement Coastal Act policies where language is vague or insufficiently obligatory. Modifications typically include changing "should" or "may" to

"shall;" "encourage," "consider," or "prioritize" to "shall" or "require;" "minimize" to "avoid;" and deleting phrases such as "where feasible."

The plan is organized with a series of goals and an "Implementation" chapter. Page 42 of the draft plan states that "the Local Coastal Program for the Coastal Zone areas in the University Community are integrated into this Community Plan. The Implementation chapter contains policies to protect and enhance coastal resources…." The various references to the implementation portion of this plan may be somewhat unclear as written, since as noted above, the University Community Plan serves as a segment of the City's Land Use Plan, and the LDC is the "Implementation Plan" portion of the City's Local Coastal Program. Under the Coastal Act, this distinction is significant, as the standard of review for Land Use Plan amendments is the Coastal Act, and the standard of review for Implementation Plan amendments is the LUP. Page 14 describes the Local Coastal Program aspect of the plan, and may be an appropriate location to clarify the status of the Community Plan as a segment of the City's LUP.

As noted on page 17, this Community Plan differs from the 1987 Community Plan in that it "lifts previous restrictions on land use and development intensity in order to promote more flexibility and mixed use development opportunities. It also allows for higher density and intensity development in the North University area, which aligns with General Plan recommendations for additional homes and jobs within walking and bicycling distance of the trolley stations." The existing University Community plan requires that any changes to land use and development intensity be reviewed by the Coastal Commission through an LCP Amendment. The existing plan also requires a "Transportation System Management" program to be approved by the City Council and the Coastal Commission through an LCP Amendment.

The intent of this requirement in the existing plan was to ensure that new development and density increases near the coast did not negatively impact public access and recreation by increasing traffic as well as the demand for automobile parking without providing sufficient additional parking to offset this increase in demand, thus leading to difficultly reaching the coast and fewer parking spaces available to the public for coastal access. Evaluating these impacts is particularly important for visitors and inland residents who do not live near the shoreline, for whom a trip to the beach often means using a car to transport people, pets, food, drink, and beach equipment to shoreline destinations, particularly when there is a dearth of transit alternatives to reach the beach.

As such, the Coastal Commission and many local governments implementing their LCPs have imposed minimum parking requirements to ensure that new development is consistent with the policies of the Coastal Act and certified LCPs, including those relating to public access and recreation. However, Coastal Act policies also strongly support the provision of alternative forms of transit to private vehicles, as well as bicycle and pedestrian improvements. Increases in density can provide opportunities to implement alternative transit and circulation improvements and as such, can reduce greenhouse gases. The draft plan contains many goals regarding transit-oriented development, mobility

hubs, and other circulation improvements, including a policy goal to “increase accessibility to the beaches and shoreline in a manner compatible with resources protection” (p. 178).

In all cases, Land Use Plans should ensure that public access and recreation opportunities are protected, enhanced, and maximized. It is not enough to simply provide access to and along the coast, and not enough to simply protect access; rather such access must also be maximized. Section 30500 of the Coastal Act requires that each LCP contain a specific public access component to assure that maximum public access to the coast and public recreation areas is provided.

In order to ensure that public access to the shoreline specifically is supported by the plan, and to allow flexibility for future implementation of projects such as lane diets, staff recommends the following goals and policies be added to the plan:

Goal:
Multimodal access to the biological, cultural, and recreational value that beaches and other coastal resources offer is important for people who live, work and visit within the community. Having a balanced transportation system with multimodal infrastructure that safely and efficiently moves people of all ages, incomes, and abilities will provide additional mobility options that help to reduce greenhouse gas emissions and vehicle miles traveled. This will help to support a healthier future.

Policies

1. Pursue mobility projects and programs throughout the City that support sustainable, equitable, and safe ways to move around such as walking, bicycling and transit, in order to help to reduce vehicle miles traveled (VMT) to meet State, regional, and local climate and mobility goals. This can include mobility projects that repurpose existing streets or other public rights-of-way, and mobility programs that can replace single-occupancy vehicle trips, such as:
    a. Provide new bicycle and pedestrian lanes or pathways.
    b. Enhance existing pedestrian and bicycle facilities to address safety and public access issues.
    c. Reduce or repurposing vehicle travel lanes to enhance multimodal access within the public right-of-way.
    d. Modify or replace on-street vehicle parking with sustainable transportation facilities where the right-of-way does not yet provide high-quality multimodal access, and where adequate, alternative parking for coastal access will remain available nearby. This can include, but is not limited to, parking conversion through restriping for transit, pedestrian, and bicycle access enhancements.
    e. Use temporary closures of streets to vehicle traffic, where alternative vehicular access currently exists, to enhance the right-of-way for more vulnerable roadway users during special events.
    f. Provide transit infrastructure, such as dedicated travel lanes, turnout

areas, crosswalks, shelters, and stations.

g. Providing improvements for shared mobility services, such as ride-share, electric scooters and bikeshare to increase public access.

2. Encourage public coastal access through operational measures that include, but are not limited to, greater turnover of public parking through time-limited and/or priced parking and through increased transit, neighborhood circulator services, and micromobility options. Paid and time-limited parking should not unreasonably interfere with the public's ability to access the shoreline or discourage the use of public visitor and recreational facilities. In areas in the Coastal Zone where street parking is used for beach or park access, a minimum of 4-hour parking shall be allowed. Parking fees should generally be comparable to those charged at similar public facilities in the region, and should only be considered as part of a program that provides access for low-income users. Parking revenue collected in the Coastal Zone shall be directed towards the provision of alternative transit options within the Coastal Zone.
3. Consider all forms of travel when providing multimodal access to coastal recreation areas.
4. Ensure that mobility projects are consistent with habitat protection polices and standards, such as wetland buffers and the protection of environmentally sensitive habitat.
5. Projects in the Coastal Overlay Zone that result in changes to the planned or ultimate roadway classifications of major coastal access roadways or remove on-street vehicle parking shall assess the project's effects on public coastal access with regards to biking, walking, transit access, and vehicle circulation through a coastal development permit. Where appropriate, this analysis should include quantitative assessments of levels of service on major coastal access roadways, and/or qualitative assessments of how travel times resulting from the project will affect the ability of the public to access the coast and other public recreational resources such as trails and parks. In particular, the analysis should consider potential impacts to the ability of environmental justice or disadvantaged communities to access the coast and options for avoiding such impacts. Where an analysis identifies unavoidable impacts, roadway modification projects shall be accompanied by additional public access benefit enhancements promoting equitable multimodal access. Public access benefit enhancements may include, but are not limited to, increased transit services, improved pedestrian and cyclist access, and increased public parking.
6. Monitor the effects of a mobility project on public coastal access and other public recreational resources such as trails and parks, where applicable, for bicycle, pedestrian and transit access, and vehicle circulation. Where impacts to public access are identified, off-setting public access benefit enhancements shall be pursued.
7. Protect existing City-owned parking for coastal access.

As cities implement measures to reduce reliance on individual cars, planning documents should recognize that public access to the shoreline still largely relies on cars and parking along the coast. It is important to maintain existing public parking that is used to access the shoreline and recreational areas. The existing Community Plan requires "a minimum of 187 public parking spaces be retained on public land [the location of what is now the Hilton La Jolla Torrey Pines] for golf course uses; in addition, at the adjacent Lodge at Torrey Pines, there are 40 parking spaces reserved daily for golfers and 94 parking spaces reserved during tournaments." (Footnote 1 to Table 2 Land Use and Development Intensity). This requirement was added through San Diego LCPA 2-98-A where the Commission found these parking lot spaces must be identified and protected as a public parking resources that provides access to public coastal recreational sites such as the golf course and State Reserve (staff report: https://documents.coastal.ca.gov/reports/1998/8/W12a-8-1998.pdf). The existing plan should retain policies that identify and protect these parking spaces for public use.

The existing community plan notes that "areas where excess and under-utilized parking exists during summer daylight hours, such as UCSD, could provide a parking reservoir for future shuttle systems to beach areas." This should remain a goal of the proposed plan.

Portions of UCSD could also provide a general parking reservoir on weekends and holidays to help support the high demand for beach access parking on La Shores Drive. A goal of the plan should be to work with UCSD on opportunities to provide coastal access parking at the University during periods of low University use such as weekends, holidays, and summers.

Other existing parking lots near recreational areas can also serve as a general public parking reservoir. Please consider the following policy:

> A program to utilize existing parking facilities for office and commercial development located near beaches and other coastal recreational areas for public access parking during periods of normal beach use when such development is not open for business should be developed. Where feasible, new non-visitor serving office or commercial development may be required to provide public parking for beach and coastal access during weekends and holidays.

In the past, there have been conflicts between people seeking to use public parking lots at the Torrey Pines Gliderport and other public parking areas during major golf tournaments at Torrey Pines, as well as use of the Gliderport itself during events. Policies in the plan should outline how public access and recreation will be maintained during major events at the golf course, including requirements for public access management plans requiring public notice, signage, alternative means of access if closure of public lots is ever necessary.

Page 36 lists the residential land use densities for the University Community. Commission staff have recently received public inquiries regarding how the various density bonus

programs in the Land Development Code are consistent with the density limits contained in Community Plans. The City should consider adding language acknowledging that these density limits may be exceeded through density bonus programs.

Page 42 notes that Coastal Development Permits are issued by the City. However, Currently, the 75-acre Torrey Pines City Park is an area of deferred certification (ADC). It was designated as an ADC due to the lack of a master plan addressing the coastal bluffs, their stability, and public access needs. Please confirm that this area is to remain an ADC, where the Coastal Commission retains coastal permit authority.

As discussed above, in order to ensure the Land Use Plan policies implement the mandatory requirements of the Coastal Act, staff suggests the following revisions to the introduction to the Implementation Chapter on page 166:

> These tables, combined with the zoning information in the Land Development Code, provide a framework to guide development. These tables ~~should~~ will be used by City staff and decision-makers to assess if a development should be considered consistent with this community plan. The Community Plan Policies, reflect specific direction, practice, guidance, or directives to support and implement this plan's land use, mobility, urban design, parks, and public facilities goals. The policies are listed in a comprehensive table for ease of use. Development projects ~~should make every effort to~~ shall conform with all applicable policies.

On page 177, staff recommends the following revision to policy S:

> Maintain natural drainage systems and minimize the use of impervious surfaces to protect open spaces and coastal watersheds. Ensure ~~Concentrations of~~ runoff ~~should be~~ is adequately controlled through pervious areas, vegetated swales, and retention basins to prevent downstream erosion.

On page 178, because the City's Vernal Pool Habitat Conservation Plan has not been incorporated into the City's LCP, staff recommends the following revisions:

> Preserve and manage vernal pools in accordance with the Vernal Pool Habitat Conservation Plan. Seek opportunities to restore vernal pools where appropriate, including working cooperatively with property owners. Vernal pool habitat in the Coastal Zone shall be preserved and shall be protected from encroachment and urban runoff with appropriate setback and buffers.

On page 180, Policy 5.11 contains several policies regarding Paleontology and Archaeological Resources. Staff believes in order to fully protect these resources the following specific policies should be added:

> Development shall be sited and designed to avoid adverse impacts to archaeological and paleontological resources to the maximum extent feasible.

a. If there is no feasible alternative that eliminates all impacts to these resources, then the alternative that would result in the fewest or least significant impacts to archeological and paleontological resources shall be selected.
b. Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, adequate data recovery and mitigation for adverse impacts to archaeological and Native American sites as part of development shall be provided; including measures to monitor and recover buried deposits from the tribal cultural, archaeological and historic periods, under the supervision of a qualified archaeologist and a Native American monitor.

The portion of the plan area within the Coastal Zone includes two hotels in an area designated for commercial recreation. The planning area also contains the Torrey Pines golf course. Commercial recreation uses are a high priority use in the Coastal Zone, and the plan policies must provide for the provision and protection of visitor-serving commercial and recreational uses. In particular, lower-cost overnight accommodations should be encouraged. Staff recommends adding the following policies:

> Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.
>
> Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.
>
> The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.
>
> Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.
>
> Lower-Cost Visitor Accommodation in the Coastal Zone. New high-cost overnight accommodations shall provide at least 25% of the proposed units as lower-cost accommodations on-site. If provision of lower-cost units on-site is determined to be infeasible pursuant to a feasibility analysis, then the new development shall provide lower-cost units elsewhere within the City's Coastal Zone. If provision of lower-cost units off-site in the City's Coastal Zone is determined to be infeasible pursuant to a feasibility analysis, then the new development shall provide lower-cost units elsewhere within the San Diego County Coastal Zone. If it is determined that the project cannot provide lower-cost units on or offsite, in-lieu fees shall be required. An in-lieu mitigation fee of $137,000 per room adjusted for inflation using the Turner

> Building Cost Index plus land cost square footage shall be required. Land cost calculations shall be based on the average square footage of commercial land sales in the City over the past five years. The fee shall be used for construction of new lower-cost hotel rooms or other inherently lower-cost accommodations within the coastal zone in the City. All in-lieu fee payments shall be deposited into an interest-bearing account, to be established and managed by the State Coastal Conservancy, or a similar entity approved by the Executive Director of the California Coastal Commission, which shall only be used for the provision of new lower-cost overnight accommodations. Funds may be used for activities including land acquisition, construction, permitting, or renovation that will result in the provision of additional lower-cost overnight visitor accommodations. If any portion of the in- lieu fee remains five years after it is deposited into the interest-bearing account, the funds may be used to provide lower-cost overnight accommodations outside of the City, in the County of San Diego coastal zone.

The proposed plan includes some policies regarding polluted runoff. However, Turf and Integrated Pest Management Policies should be added, with particular regard to the Torrey Pines Golf Course. Please consider the following policies:

> In order to protect coastal water quality and prevent or minimize degraded runoff from the Torrey Pines golf course, turf and pest management shall favor non-chemical strategies over chemical strategies for managing weedy species and pests on site.
>
> Turf management practices shall utilize state-of-the-art environmental methods (such as Integrated Pest Management) to minimize water use, fertilizer and herbicide application, and chemical pest control to the maximum extent feasible.
>
> Chemical strategies shall only be employed after all other non-chemical strategies have been considered.
>
> Use of pesticides or rodenticides shall be prohibited.

There are currently storm drain facilities that outfall through and over the bluffs, discharging into the ocean. These outfalls erode the natural bluffs, impact water quality, habitat, and bluff stability. A plan goal should be to develop a long-range plan to relocate these facilities. Please also consider the following storm water management policies:

> Prohibit the construction or reconstruction of storm drain discharges over bluffs or into the ocean unless no feasible alternative exists, and all impacts have been minimized and mitigated to the greatest extent feasible.
>
> Maintain storm drain discharge systems to prevent erosion and improve water quality by adequately controlling flow and providing filtration.

> Encourage private property owners to design or retrofit landscaped or impervious areas to better capture stormwater runoff, and repair and maintain drainage outfalls and brow ditches that discharge directly to or are within open space lands.
>
> Integrate stormwater Best Management Practices (BMPs) on-site to maximize their effectiveness.
>
> a. Encourage use of intensive and extensive green roofs and water collection devices, such as cisterns and rain barrels, to capture rainwater from buildings for re-use.
> b. Use downspouts to discharge into areas that can effectively reduce direct flows of rainwater from buildings to the stormwater drainage system.
> c. Minimize on-site impermeable surfaces, such as concrete and asphalt, and encourage use of permeable pavers, porous asphalt, reinforced grass pavement (turf-crete), or cobble-stone block pavement to effectively detain and infiltrate more run-off on-site.
>
> Encourage Low-Impact Development (LID) practices such as bioretention, porous paving, and green roofs, that slow runoff and absorb pollutants from roofs, parking areas and other urban surfaces.
>
> a. Incorporate bioswales or other appropriate LID design practices where sufficient public rights-of-way and other conditions allow throughout the community.
> b. Prioritize efforts to capture stormwater before it enters canyons or natural open spaces.

Policy 5.10 C in the proposed plan states:

> C Ensure exotic or invasive plant species are not [to] be planted within or adjacent to existing sensitive habitats and ensure the removal of non-native species to protect biological resources.

However, it is important that municipalities avoid the use of invasive species throughout the area, including for street tree plantings. Please consider the following policy:

> Provide an appropriate mix of both native and low or very low water needs tree types to provide a diverse ecosystem more able to adapt to changing environmental pressures. Prohibit using species that are on the California Invasive Plant Council Inventory.

The plan has various goals supporting bird-safe design and lighting. However, the policies under 2.9 Canyon Adjacent Development apply only to areas adjacent to canyons, open space, and the MHPA. The policies under 2.11 Lighting “limit” upward lighting and note that nighttime lighting “should” be directed towards high-traffic areas. However, more

specific protective policies are appropriate to protect habitat and sensitive species. Migrating birds are vulnerable to bird-strikes and impacts associated with lighting spillover into the night sky in all locations, and policies should ensure that these impacts are avoided or minimized throughout the planning area. Please consider additional policies such as the following:

> Bird-Safe Design. Encourage the use of special design and window treatments to improve the degree to which new developments are bird-safe. Green design that facilitates bird safety includes: reduction of reflectivity and transparency in glass, the avoidance of light pollution, reduced disturbance to natural landscapes, and biological systems, and lowered energy use.
>
> Building edges of exterior courtyards and recessed areas shall be clearly defined, using opaque materials and non-reflective glass.
>
> Buildings shall be designed to minimize light spillage and maximize light shielding to the maximum feasible extent according to the following standards:
>
> i. Nighttime lighting shall be minimized to levels necessary to provide pedestrian security.
> ii. Building lighting shall be shielded and directed downward.
> iii. Up-lighting and use of event “searchlights” or spotlights is prohibited adjacent to canyons, open space, and the MHPA.
> iv. Landscape lighting shall be limited to low-intensity and low-wattage lights.
> v. Red lights shall be limited to only that necessary for security and safety warning purposes.
>
> Artificial night light from interior lighting shall be minimized through the utilization of automated on/off systems, motion detectors, or similar devices.

The plan contains fire safety and brush management policies; however, it does not clearly require new development to be planned and designed to avoid encroachment into native vegetation for brush management. This is a critical part of preserving natural habitat while maintaining public safety. Please consider the following policies:

> Locate, design, and construct new development to provide adequate defensibility and necessary brush management without encroaching into Environmentally Sensitive Lands or native vegetation.

The plan contains many acknowledgments of the scenic views in the planning area, but the policies should be more specific about requirements for the protection of public views. Please consider the addition of policies such as the following:

> The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance.

> Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.
>
> Measures to avoid and minimize adverse impacts on scenic areas include, but are not limited to, siting development in the least visible portion of the site, breaking up the mass of new structures, designing structures to blend into the natural setting, restricting building maximum size, reducing maximum height standards, clustering development, minimizing grading, and incorporating landscape elements.
>
> New development in highly scenic areas shall be subordinate to the character of its setting. The design of hillside developments should relate to the existing topography
>
> Ensure visual and physical access to natural canyons, resource areas and scenic vistas.

Under Section 7.0 Public Facilities, Services and Safety Policies on page s183 and 184, please consider the following additional hazards policies:

> Siting and design of new shoreline development shall take into account anticipated future changes in sea level, based on the best available scientific information and projections or range of projections of future sea level.
>
> New development shall be planned and located to be safe from hazards and not require protection over its entire lifespan.
>
> Shoreline protective devices shall only be allowed to protect existing structures and when no other feasible alternative exists, and when fully mitigated for all impacts including public access, recreation, and sand supply.
>
> Sea level rise adaptation should be incorporated into redevelopment where appropriate.
>
> The removal or relocation of existing development that is threatened by sea level rise is encouraged.
>
> The use “soft” or “natural” solutions are preferred alternatives for protection of existing endangered structures

A sensitive biological resources map that identifies habitat types and location must be part of the plan. In addition, the following policies will help meet the Coastal Act requirements for the protection of environmentally sensitive habitat and wetlands:

> Permitted uses in wetlands shall be limited to those in the Environmentally Sensitive Lands regulations. No development shall encroach into wetlands, floodplains, vernal

pools, and other sensitive resources, and shall maintain a minimum 100-foot buffer from wetlands and sensitive resources per the Environmentally Sensitive Lands regulations, and shall be designed to minimize or avoid adverse effects to the resources.

All lands meeting the definition of ESHA shall be regulated through the ESL regulations. ESHA shall be protected against significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas. As part of the ESL review, the required biological assessment shall include a site-specific determination as to whether or not the on-site resources constitute ESHA, as defined herein. If on-site resources are determined to constitute ESHA, prohibit development that is not dependent on those resources and require open space protection or conservation easements as a component of new development. Development adjacent to ESHA and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas. Development adjacent to environmentally sensitive habitat shall minimize impacts to habitat values or sensitive species to the maximum extent feasible. Native vegetation buffer areas shall be provided around ESHA to serve as transitional habitat and provide distance and physical barriers to human intrusion. Buffers shall be of a sufficient size to ensure the biological integrity and preservation of the ESHA they are designed to protect. All buffers around (non-wetland) ESHA shall be a minimum of 100 feet in width, or a lesser width may be approved by the Planning Department and Fire Marshal as addressed in Policy X. However, in no case can the buffer size be reduced to less than 50 feet.

Policy X. In some cases, smaller buffers may be appropriate, when conditions of the site as demonstrated in a site specific biological survey, the nature of the proposed development, etc. show that a smaller buffer would provide adequate protection. In such cases, the California Department of Fish and Wildlife must be consulted and agree that a reduced buffer is appropriate and the City must find that the development could not be feasibly constructed without a reduced buffer. However, in no case shall the buffer be less than 50 feet.

Regarding the proposed land use and zoning changes, we would appreciate it if you could provide Commission staff with a table identifying any changes in the size or location of existing land use/zoning categories in the Coastal Zone, with a narrative of the reasons for the proposed revisions.

Thank you again for the opportunity to review the draft Community Plan, and I apologize that we were not able to get you these comments sooner. We appreciate the City's coordination and collaboration as we work towards our mutual goal of successful coastal resource protection.

Sincerely,

Diana Lilly
Coastal Program Manager

cc: Nora Ives

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

University Community Planning Group

May 15, 2024

Introduction

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

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

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

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

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

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

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

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

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

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p. 64 **X. Implementation**

Summary of Subcommittee Work and Recommendations:

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

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

Vision:

"A diverse and dynamic community with renowned higher education, healthcare, scientific research and technology institutions and businesses connected through a robust multi-modal transportation network to a vibrant, mixed-use urban core and varied residential neighborhoods, which protects its unique natural habitat and canyon systems."

Guiding Principles:

1) Renowned Institutions: The development of institutions that provide world leading research, higher education and healthcare which contribute to the built environment and support the economic growth and attractiveness of the community.

2) A Vibrant Mixed-Use Urban Core: A land use pattern that focuses growth into a vibrant urban core which contains regional transit connections and a distinct range of uses, character, streetscapes, places, urban form and building design as a leader in sustainability.

3) A Diversified Housing Inventory: A housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels.

4) A Center of Economic Activity: An employment center with scientific research, technology and office uses that provide jobs in proximity to residential, retail and visitor serving uses connected by transit that supports the economic viability and attractiveness of the community.

5) A Complete Mobility System: A mobility system that provides multi-modal options and a complete network for travel within the community and connectivity to the region, enhancing economic growth, livability and sustainability.

6) A Sustainable Community Integrated with its Natural Environment, Open Space, and Recreational Areas: Preservation of open space, watershed protection and improvement, restoration of habitat, enhancement of species diversity, improvement of population-based parks and recreation areas, and provision of connections for wildlife and people, contribute to community character, enhance quality of life, and preserve unique natural resources.

Strengths of Draft-University Community Plan

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

It Includes:

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

Areas of Special Concern:

The UCPG Report emphasizes several key areas of concern.

Housing and Commercial Development

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

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

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

The D-UCP housing potential is in addition to the **more than 11,000 units of new housing** ("beds") completed or under construction at **UCSD** since the start of the update in 2018.[1]

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

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

Affordability and Diversity of Housing

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

Displacement

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

The University Community Planning Group has specific concerns with:

[1] The UCSD student body was approximately 43,000 in 2023, an increase of approximately 14,000 students since 2010. Approximately 40 percent lived on campus in 2021, short of the University's goal of housing 65% of students on campus by 2035.
[2] SANDAG Series 15 Forecast. https://www.sandag.org/-/media/SANDAG/Documents/PDF/data-and-research/socioeconomics/estimates-and-forecasts/sr-15-infobits-2024-04-01.pdf
[3] E.g., Dwayne Marshall Baker and Bumsoo Lee, "How Does Light Rail Transit (LRT) Impact Gentrification? Evidence from Fourteen US Urbanized Areas" *Journal of Planning Education and Research*, vol 39 Issue 1, March 2019.

- Protections against the displacement of lower and moderate-income renters in the lowest priced housing in the UC Plan Area.

- Protection and expansion of community-serving retail and services to meet the needs of the projected population.

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

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

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

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

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

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

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

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

[4] "La Jolla Village Square" and the "Shops at La Jolla Village"
[5] EMX-2 would allow but does not require housing. The D-UCP states that: in *"Urban Employment Villages, employment would be the primary use." p. 36.*

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

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

Density

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

Parks

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

Sustainability

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

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

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

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

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

Mobility

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

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

Implementation

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

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

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

I. Commercial Plazas, South University City

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

Ia. Please incorporate the following general principles

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

Ib. Please incorporate the following specific policies:

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

Justification:

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

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

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

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

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

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

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

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

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

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

Specific Recommendations:

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

SDR C.1, p 195 Building Transitions

– Thank you for incorporating UCPG recommendation control building transitions between a wider variety of low-medium density residential zones in UC:

– Please incorporate UCPG recommendation to include **30' rear/side set back setbacks and restore 45% building plane**:

-Revise SDR C.1, p 195 Building Transitions:
"Building height shall transition under an established ***45-degree*** angled building envelope plane sloping inward from the first 30 feet of a structure to the maximum structure height, for properties abutting ***Low Density, Low-Medium Density, and Medium Density*** residential areas designated in this community plan as shown in Figure 39. ***Rear and side setbacks abutting residential uses should be a minimum of 30 feet.***"

- Please incorporate UCPG recommendation to include height limits.

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

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

- Please incorporate UCPG recommendation to reduce overall densities:

1 University Square (Vons Plaza): **54 du/ac.**
2 Southeast corner Governor/Genesee: **54 du/ac,**
3 UC Marketplace (Sprouts Plaza): **29 du/ac.**
4 Three corner parcels at Governor/Genesee (SW, NW, NE): **29 du/ac**

- Consider Zoning CC-3-5 versus CC-3-8 for 1 and 2 above
- Retain current Zoning for 3 and 4 above.

Plan Policies, Table 1, p 167-72

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

- Modify Policy 1.6 C, p 167

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

- Please incorporate UCPG recommendations:

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

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

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

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

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

~~"Retain g~~***G***rocery stores on large sites ***must be retained*** ~~where feasible~~.

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

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

- Thank you for responding to UCPG recommendation to delete unbundled parking.

- Thank you for responding to UCPG recommendation to address the need for stronger policy on building transitions (2.19D, p 172).

- Please strengthen policy with clear instructions regarding set backs, step backs, height limits, building transition, etc.

Modify Policy 2.19 D

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

- Please incorporate UCPG recommendation to:

- Modify SDR H.1 (p 196) to apply to community commercial, community village and neighborhood commercial sites of 50,000 sq ft or more:
-Delete 100,000 sf maximum.
-Require 25% commercial/retail.

- NOTE: There DO NOT appear to be community village sites in the University Community to which it applies.

- One regulation is appropriate for community plazas over 50,000 sf.
- Larger sites should provide commensurately more retail to serve larger UC population.

- Modify SDR H.1:

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

- **Delete SDR H.2, p 196.**

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

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

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

below)

- Specific requirements for outdoor space in new projects (see Parks – Urban Public Spaces, below)

- A minimum affordable housing requirement (UC wide), on-site; no in-lieu fees (see Affordable Housing, section V. below).

- Strengthen language on coordination with school district to reflect need for greater transparency and specificity in coordination w SDUSD to service proposed growth, p. 160.

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

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

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

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

Please incorporate UCPG recommendations for north UC commercial plazas.

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

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

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

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

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

III. UCPG Recommendations: Nobel/Campus Commercial Plazas

(LJ Village Square/Shops at La Jolla Village)

Please incorporate UCPG recommendations for Nobel/Campus commercial plazas.

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

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

- Please incorporate the UCPG recommendation to remove reference to a street wall along Villa La Jolla Drive.

- p. 84, revise "Focused Enhancements: Growth Opportunities"

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

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

- Revise Policy 2.18 G, p 172.

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

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

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

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

V. UCPG Recommendations: Affordability and Displacement:

1. Affordable Housing Requirement:

The UCPG supports the following general principles:

- Affordability and diversity of housing are essential goals of the UCPG (see Priority #3, pp 26-27).

- The UCPG supports an inclusionary affordable housing regulation specific to the UC Plan Area – above that of City of San Diego, Chapter 14, Article 2, Division 13 of the Municipal Code.

- The UCPG has recommended a minimum inclusionary rate of 15-20%.

- The UCPG supports a requirement that inclusionary affordable housing be built on-site; no in-lieu fees.

- The UCPG supports more – not fewer - affordable housing options.

– The UCPG supports the concept of empirical analysis to evaluate and design a UC Inclusionary Housing Requirement.

Affordable Homes Requirement in the D-UCP:

- The City of San Diego engaged Keyser-Marston Associates to undertake a feasibility analysis for a UC-specific Affordable Housing Requirement (Draft Affordable Housing Report, Mar 2024).

- The D-UCP includes an "Affordable Homes Requirement" (SDR J.1 p 197) designed in response to that analysis.

- **SDR J.1** includes 5 options for satisfying the city's Inclusionary Affordable Housing Regulations. Four of the five options (SDR J.1 1a and 1b., 2a and 2 [sic]) require that inclusionary affordable housing for low (below 60% AMI), low-moderate (below 80% AMI) and high-moderate (below 120% of AMI) income people be built with new residential development ***in*** **the University Community** – either on-site or off-site within a Sustainable Development Area in UC. The fifth option (3) incentivizes construction of inclusionary affordable housing in UC by requiring a higher in-lieu fee to opt out.

Thank you for incorporating UCPG recommendations:

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

The UCPG offers the following additional recommendations:

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

> 1.b. Offsite Option
>
> Please add specific language in the "offsite" option section to San Diego Municipal Code Section 142.1305(a) because it differs from the citywide inclusionary housing offsite ("on different premises than the development") option(s).[7]

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

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

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

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

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

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

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

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

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

"Affordable Housing Policies

a. Affordable Housing Regulations - San Diego Municipal Code, Chapter 14, Article 3, Division 7 provides "incentives for development that provides housing for very low income, low income, moderate income, or senior households, or lower income students, transitional foster youth, disabled veterans, or homeless persons. Additionally, the purpose is to specify how compliance with CA Government Code Section 65915 (State Density Bonus Law) will be implemented...." In exchange for providing affordable housing, developers receive a density bonus allowing them to build more units. The bonus depends on the percentage of affordable units provided.

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

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

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

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

2. Displacement

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

Recommendations:

– **Analyze and consider potential for anti-displacement regulations** scaled to rent/income levels in University Community (e.g., 1:1 replacement of moderate rate rental units removed through redevelopment).

- **Modify policy 1.1 2 D.** Apply requirement for on-site inclusionary housing in **Policies**.

"***Require*** affordable housing to be built on site and make units available to meet the needs of families, local employees, and students.

- Modify policy 2.19C. Apply requirement for on-site inclusionary housing in **Policies**.

-***Mixed-use developments shall include*** affordable and inclusive housing options.

- **Add policy 1.1 J.** Apply requirement for on-site inclusionary housing in Policies.

  - ***Mixed-use developments shall include*** affordable and inclusive housing options.

- **Correct/clarify SDR J.1 (p 197),** subsections 1-3.
  Numbering/organization is confusing.
  Sections are numbered 2a, 2 and 3.

- **Please include in the Final UC Plan a clear explanation of the range of city and state programs that may affect the development of affordable housing in the UC Plan Area.** Consider including this explanation on **pages 44-45** where other interacting/guiding policies are discussed.

- **Please add language in the Final UC Plan** to explain how the UC-specific Affordable Homes Requirement outlined in SDR J.1 will interact with relevant city/state programs including state Density Bonus Program and Complete Communities Housing Solutions.

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

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

VI. Mobility

UCPG Recommendations:

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

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

- Conditions of the study: that it includes new traffic data (not only the 2015 study referenced in the D-UCP and D-EIR); that it studies the current mobility configurations in the Draft UCP; that the assessment takes place when schools in the University Community are in session, including during pick up/drop off times. The study should assume that new housing will have parking spaces (and cars), and not assume that new developments will not have parking.

- Traffic study with similar conditions should also be conducted before adoption of changes proposed for Genesee Ave, Governor Drive, Nobel Dr, and UCSD entrance in Nobel Campus area.

- Plan to reassess traffic conditions with regularity.

- Final UC Plan should provide a clear plan for financing and implementation to assure that proposed infrastructure can be paid for and implemented as a whole (not merely block by block). A Maintenance Assessment District would be one example of financing for the support of various mobility solutions.

B. Bicycle infrastructure:

- The UCPG supports protected bike lanes along major streets throughout the Plan area with the expectation that these will be continuous. Discontinuous bicycle infrastructure is not safe and will not meet goals for increasing bicycle use and shifting transportation mode share.

- The Plan should include clear plans for how bicycle infrastructure in the mobility plan will be implemented.

- The UCPG recommends that the city include a policy to preserve setbacks in private developments sufficient to allow construction of future bike infrastructure.

- The UCPG recommends that because of expected costs and budget limitations, the Plan should identify and *prioritize* bike infrastructure in critical streets/segments so that the ones needed most are built first (or built at all). The Plan should include a path to bike/pedestrian infrastructure most likely to be built and most likely to work.

- Final UCP should provide a clear plan for financing and implementation to assure that proposed infrastructure can be paid for and implemented as a whole (not piecemeal).

- Please Correct Table 4: Planned Bicycle Classifications Modifications, p 203 **for consistency with Policy 3.3D**, p 173

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

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

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

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

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

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

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

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

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

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

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

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

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

Please incorporate the UCPG recommendations to

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

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

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

- The UCPG recommends that the city complete the connection between I-5 bicycle path (Coastal Rail Trail) and the SR-56 bike path via old Sorrento Valley Road to increase bicycle ridership to and from UC from Carmel Valley and north. These northern communities are a primary source of commuters to UC.

- Although this connection would be completed just outside the UC Plan Area, it affects mobility in the UC Plan, and we encourage the city to include this priority in the UC Plan and adjoining community plans.

F. Pedestrian Bridges

- UCPG and Subcommittee members have expressed support for additional pedestrian bridges to separate auto/non-auto traffic at major thoroughfares in the community.

- The city can address this concern by studying the potential for additional pedestrian bridges at Nobel Drive (west of I-5); Genesee Ave (at Governor Drive).

VII. UCPG Recommendations: Parks and Recreation

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

Based on staff corrections to the D-UCP reported to UCPG, (April 9, 2024)*,* the **deficit is projected to be ~4,100 points at build out, which represents park facilities for ~41,000 people**.

The published (uncorrected) deficit in the Draft UCP is 5,592 points, which represents park facilities for ~56,000 people. (Table 7, p 213).

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

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

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

- The new Aquatic Complex at Standley Park is **a joint use facility** that is not accessible to the public during school hours for most of the year.

- The Recreation and Aquatic Center at the **proposed "Torrey Pines Neighborhood Park," while welcome, is contingent upon non-renewal of a current lease**, which is **not up for renewal until 2043**.

- Thus, the D-UCP offers no potential for improvement in the Recreation and Aquatic Center deficit for at least two decades into the life of the new community plan.

In sum, the D-UCP <u>does not meet</u> the Parks Master Plan guidelines for recreational values, and <u>it does not meet its own stated goal</u> to:

> "*Increase recreational value by keeping pace with population growth through additional investments in existing parks, acquisition of additional available land for parks, and the additional new parks and public spaces as part of new private development projects."* (D-UCP, p121)

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

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

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

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

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

UCPG Recommendations:

A. Account for Recreational Value Fully and Transparently.

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

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

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

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

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

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

Recommendations:

Please incorporate UCPG recommendations:

- p. 213. Check and Correct "Total Recreational Value Points Community Wide," (Table 7 on p 213) to ensure that the tally matches the sum of points listed for individual facilities in "Proposed Recreational Park Values" (p. 206-213).

- **Incorporate UCPG recommendations for Specific Park and Recreation Facilities** listed in **Section H** below.

- **Make recreational value scoring sheets for specific parks publicly available** so that community members can check that work and contribute.

- Correct population figures on p 133: "**Existing and Projected Recreational Value Points**." Ensure consistency btw p 46 and 133.

> *"The University Community could attain a projected population estimated at ~~144,212~~ **129,566** people. The community should have access to enjoyable parks, recreational centers, and aquatic complexes as…" (133)*

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

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

Specific Recommendations:

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

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

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

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

C. Clarify and Strengthen Policies for Urban Public Spaces.

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

Additional revisions will help to clarify and complete this progress.

Outstanding issues:

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

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

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

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

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

Specific Recommendations:

- The D-UCP should clearly and explicitly state the requirements for Recreational Value in public spaces provided for Residential and Mixed-Use developments.

- Please restore SDR 1.K (Discussion Draft, p 191) to new section SDR A.1 clarifying how Residential and Mixed-Use Developments will satisfy the requirement for public spaces and recreational values.

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

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

> - SDR A.1 should first identify the urban public space requirement.
> - SDR A.2 should follow with guidelines for the amenities that may be required in the spaces provided by developments of different sizes.
>
> Currently this order and logic is reversed.
>
> - In addition, new SDR A.1 should begin with the public space requirements for developments of different sizes. Currently this info is buried in SDR A.2, section 3:
>
> > ***3 Size. A minimum of 5 percent of the premises or 5 percent of the gross floor area of the development, whichever is greater, shall be provided as public space. The maximum amount of public space required shall not exceed more than 15 percent of the premises." (p.192)***
>
> Steps to resolve:
>
> > - Please renumber SDR A.2 as SDR A.1 and move it to the beginning of the SDR's
> >
> > - Please renumber current SDR A.2, section 3, as SDR A.1, section 1.

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

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

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

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

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

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

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

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

D. Neighborhood Scale Parks

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

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

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

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

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

More effort is needed in this category.

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

Recommendation:

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

E. Land Acquisition

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

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

The operative word is "**shall**."

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

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

Specific Recommendations:

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

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

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

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

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

F. Funding and Implementation Mechanism for Parks

The UCPG appreciates the creative effort to design SDR***A1-5*** **(p 187-93)** for Urban Public Spaces; however, as noted, even with this effort, the Draft does not come close to meeting the required recreational values mandated by the *Parks Master Plan*. It cannot meet the land acquisition mandate. It cannot meet the requirement for Recreation Centers ***or Aquatic Facilities***.

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

Specific Recommendations:

- Consider a **supplemental funding mechanism** such as Supplemental Development Impact fees ("Future Opportunities Fund") for Parks in UC (see section X below).

- Consider a **revised or expanded SDR-1 A.F and G** to scale park facilities to the size of development with the goal of providing **Neighborhood (>3 ac)** and Neighborhood-Scale Park **(1-3ac)** facilities in developments of sufficient size (see above).

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

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

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

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

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

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

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

Column 4: Rows 6-24:

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

Substitute the following process statement for current lists of amenities:

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

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

- Update Project Description – Many current facilities appear to be missing - include existing facilities – overlooks, trails, beach, picnic tables, cafe, deck, etc.

- Fully score existing park facilities to ensure that recreational value tallies are accurate for current and existing points

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

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

- Please Add and Score - Old Route 101 Trail

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

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

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

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

- Clarify the intention that Weiss Park/JCC facilities are public[10]

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

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

Specific Recommendations:

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

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

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

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

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

- p.**208, line 13**
Confirm and Re-Score Mandell Weiss Park
("Existing Park Value") ***including*** **JCC facilities**.
Facilities listed in website include recreation center, fitness gym, tennis center and courts, theater, and aquatic center.

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

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

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

- p **208**, **Change the acreage** to ***10.49 acres*** in column "Existing Size"

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

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

"Work with the JCC and the Community to determine needs and priorities."

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

- p. 208 – Future Neighborhood Park Opportunities

- **Town Park Villas Golf Course**:

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

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

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

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

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

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

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

Recommendations:

Please incorporate the recommendations of the UCPG:

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

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

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

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

- Modify language, p. 126:
Please use "Linear Parks" (versus "greenway") to clarify the city's intention that these will be ***PARKS***, planned, managed and maintained by Parks and Recreation Dept, and ***not STREETS*** managed and maintained by TSW.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- **Update description**:

Governor Drive ~~Greenway~~ Linear Park

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

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

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

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

- p 210:

- Please restore potential Gullstrand St. Trailhead Pocket Park.

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

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

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

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

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

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

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

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

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

- Update Recommendations:

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

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

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

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

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

- p. 210, #29. ~~J~~oint Use – SDUSD – Mission Bay Montessori.

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

- Revise recommendation:

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

- p. ~~134~~ 210 Joint Use Opportunities – University City High School

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

The UCPG recommends that the City continue to:

- Consider future Joint Use opportunities at UCHS.

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

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

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

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

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

- p. 212 #32 Rose Canyon Open Space Park

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

- **Revise recommendation**:
"Complete a Natural Resources Management Plan to inform future uses."

- Please Correct Typo:

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

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

VIII. UCPG Recommendations: Sustainable Community – Guiding Principle 6 (*"A Sustainable Community Integrated with its Natural Environment, Open Space, and Recreational Areas,"* **p 13***)*

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

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

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

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

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

B. Dedication of Open Space

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

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

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

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

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

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

Specific Recommendations:

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

Figures provided for reference:

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

[13] **Correct acreages are available for parcels K302 P2, K302 P3, L310 RU, L303 RU, L303 PM, via the City's City Owned Property tool:**
https://sandiego.maps.arcgis.com/apps/webappviewer/index.html?id=7cace2f50ec7459e84acaa98345c2806

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

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

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

Map of City Owned Property

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

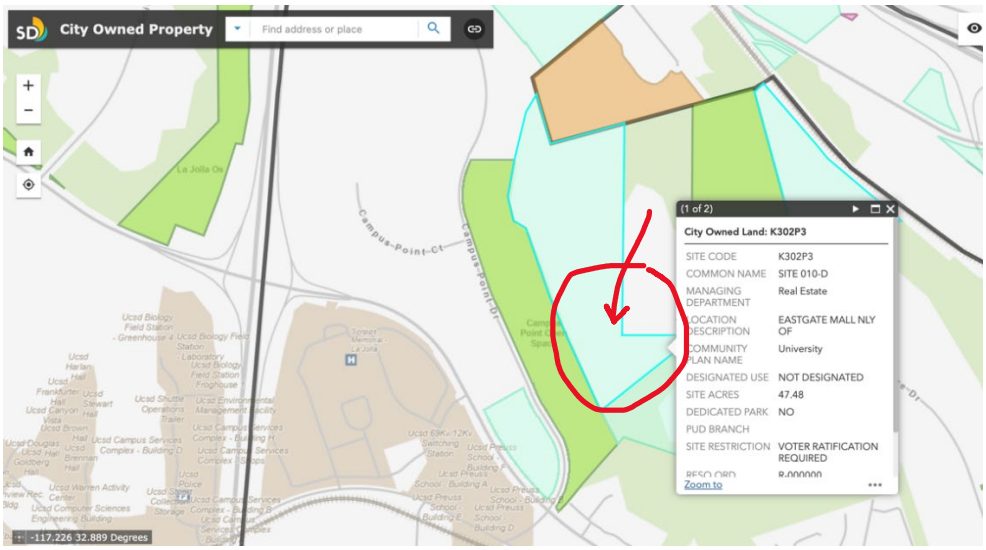


Figure 4. Post-Project MHPA and Conserved Lands, Biological Resources Report, D-UCP.

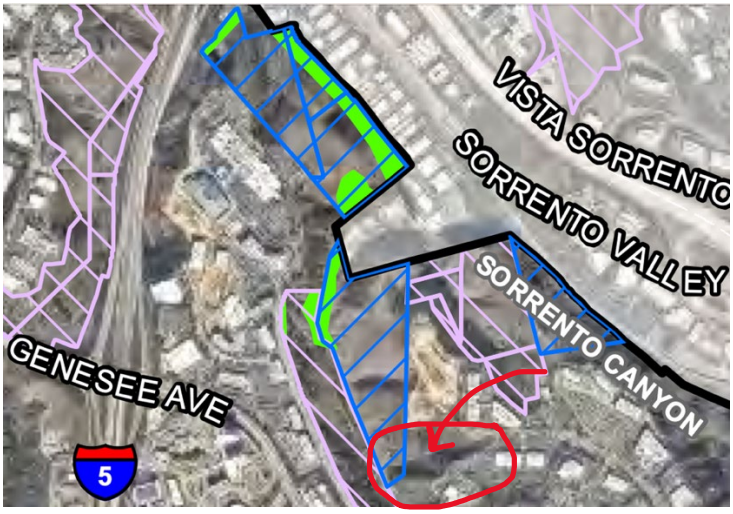


Figure 4 omits a portion of one parcel (K302 P3) proposed for dedication. The missing sub-parcel is APN: 343-121-05. It is approximately 5-acres in size.

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

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

Additional Open Space Recommendations:

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

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

C. Native Trees and Landscaping:

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

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

This is a small step in the right direction.

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

Specific Recommendations:

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

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

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

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

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

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

- **Urban Greening: Prioritize native vegetation**

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

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

4.1 M.1*. "Prioritize use of native vegetation in Green Streets"*

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

Please incorporate UCPG recommendation to delete conditional phrase, "where possible." [14]

- Please Modify Policy 4.2 D, p. 178

"Retain ***and restore*** native vegetation in open space areas."

- Modify Policy 5.6 A. p 178

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

- Urban Forestry: Prioritize Native Trees

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

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

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

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

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

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

Specific recommendations:

- p. **70**, columns 1 and 2. – **Please** Incorporate justification for use of native trees

- p. **74**, column 1, paragraph 1, **Please** insert language

"…urban greening allows for double the benefits when considering the community's mobility network as an additional opportunity to expand open space ***and ~~wildlife habitat~~*** ***enhance biodiversity.***"[15]

a. Please incorporate recommendation of UCPG to identify specific street segments as locations for Native Trees and Shrubs.

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

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

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

b. Identify the following street segments as Native Tree "Corridors" to enhance connectivity between open **s**pace areas, especially for birds

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

and insects

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

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

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

- p. **200-202**, **Table ~~1~~ 3: Street Tree Matrix:**

- Please add native trees as primary selections – not merely options: The matrix includes just **ONE** native tree (Western Sycamore, Platanus racemosa).

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

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

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

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

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

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

Recommendations:

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

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

-Add policy to 4.2, p 181:

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

- Please incorporate UCPG recommendation to:

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

E. Protect Watersheds:

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

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

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

Recommendations:

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

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

Please Update/Correct language on watersheds, p 139:

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

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

F. Riparian Protection and Restoration:

Please incorporate UCPG recommendation for stronger language supporting riparian protection:

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

Recommendations:

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

  (See policy 4.2M below)

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

F. Protect, Manage, Restore Wildlife Corridors

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

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

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

Recommendations:

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

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

[16] For accuracy: UC is in the Peñasquitos Watershed *Management Area* (an administrative area), but it drains into three watersheds (natural hydrological areas) – Mission Bay, La Jolla, and Los Peñasquitos.
See https://projectcleanwater.org/watersheds/mission-bay-la-jolla-wma/

Add policy 5.13 F.1. p. 180

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

Correct Figure 29, p 143.

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

G. Community Gardens:

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

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

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

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

Clarify definition of "canyon" and "canyon edge."

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

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

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

Thank you for incorporating several of these recommendations.

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

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

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

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

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

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

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

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

Recommendations:

The following are UCPG recommendations related to

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

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

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

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

- Please correct awkward text re "reflective glazing."

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

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

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

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

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

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

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

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

- p. **195**, please refer specifically **to "Canyon Edge Setback" identified in figures** on pp **79, 83, 99.** (and **Planned** Land Use**s** on p **33**).

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

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

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

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

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

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

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

- **Modify 2.9 C and D, p 169.**

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

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

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

Modify policy 2.9 C. Replace with:

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

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

E.g: 2.9 D. :

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

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

2.9 D2, Add new policy:

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

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

-e.g., 2.9 E.:

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

Please incorporate UCPG recommendation for a policy on native landscaping:

- 2.9 F. Add Policy on Native landscaping

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

c) CPIOZ – Supplemental Development Regulation C.2:

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

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

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

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

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

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

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

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

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

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

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

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

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

Recommendations:

- Please replace SDR C.2 (D-UCP p 195) with SDR-21 a-d "Building Design Abutting Open Space" (Discussion Draft, p 201) see below.

- Please revise SDR C.2 following UCPG recommendations:

- Please restore application of SDR C.2 to: *"Development on sites directly abutting an open space area designated in this community plan."*

- Please define base for setback zones at the canyon edge – as defined by Planned Land Uses (see Figure 33)

- Please clarify that SDR C.2 applies to "Development" in general (in conformity with CPIOZ area in Fig 35, p 186.

- Please restore explanatory section introducing SDR C.2.
"Canyon-Adjacent Development The purpose and intent of these supplemental development regulations are to provide design regulations to lessen the effect of buildings developed adjacent to open space areas designated in this community plan."
(See Discussion Draft, SDR 21, p 201)

- Please incorporate UCPG recommendations to strengthen adjacency guidelines of former SDR 21 (Discussion Draft):

- Consider 35' setback, in conformity with MHPA Brush Management Guidelines

"SDR C.2 Building Design abutting Open Space:
Development on sites directly abutting an open space area ***designated in this community plan*** *shall conform with the following requirements:*

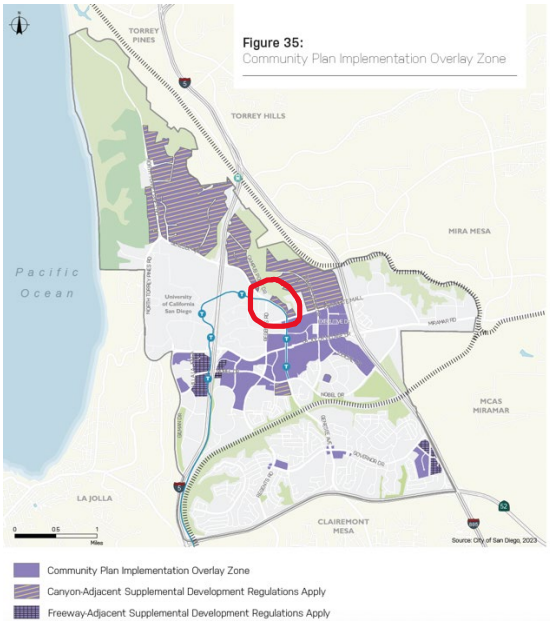
a) For a premises greater than 300-feet in depth from the street, provide a ***35-*** *foot building setback from the open space area.*

b) Provide a 15-foot upper story stepbacks at least 50 feet above the ground level for the portion of the building fronting the open space area.

c) Orient the short ends of buildings toward the open space areas or break down the length of façades facing the open space areas with articulation in the form of one 4-foot offset in the building plane for every 50 feet of façade length.

d) ***Design buildings to eliminate bird strikes and intrusion of light and glare into adjacent canyons.*** The use of highly reflective and mirrored glazing is not permitted fronting open space areas.

Based on the definition selected in SDR C.2, Figure 35 is no longer accurate. “Canyon Adjacent Supplemental Development Regulations” do not apply to the region mapped.
The only parcels to which SDR C.2 appears to apply are at the corner of Genesee and Eastgate Mall.



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

Thank you for incorporating UCPG recommendation to support restoration:

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

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

Please incorporate UCPG recommendation to:

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

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

Thank you for incorporating UCPG recommendation:

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

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

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

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

- **Modify language, p. 124 – paragraph 4**,

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

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

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

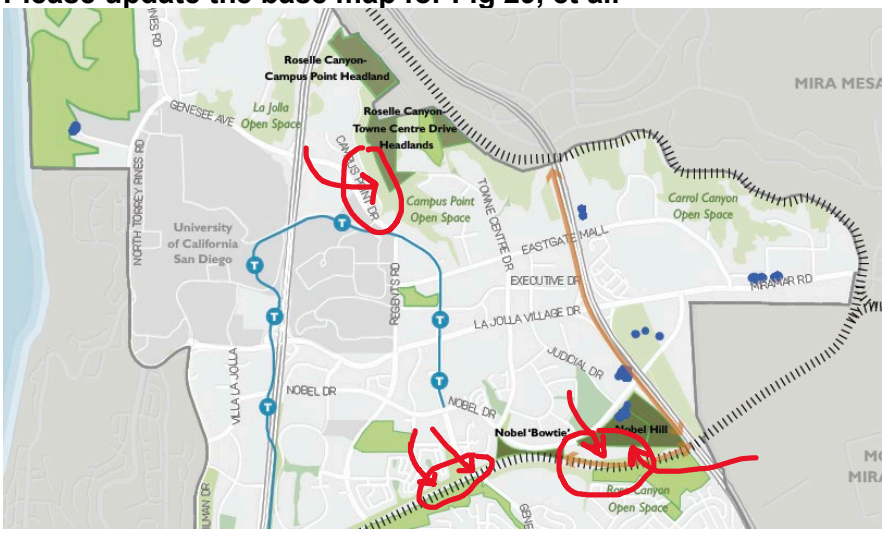
> Clarify use of "designated" and "dedicated" open space – it is confusing.

Please complete UCPG recommendation to fully correct Fig 29:

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

[20] See *Parks Master Plan*, Park and Recreation Facility Typologies: "Open Space," 21 and 32.

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



K. 4.2 Trails, Overlooks and Pocket Parks, p ~~181~~ 178

Please incorporate UCPG recommendation to

Add ~~revise~~ Policy 4.2 A1, p 178: Priority for Overlooks adjacent to MHPA[21]

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

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

IX. POLICY RECOMMENDATIONS –
Parks and Recreation – Open Space and Conservation:

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

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

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

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

---

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

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

4.1 J. Thank you for incorporating UCPG recommendation:

I.e.,
4.1 J. Separate the two ideas conflated in 4.1 J.

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

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

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

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

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

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

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

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

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

I.e., 4.1 U. Emphasize native landscaping and design features ***that enhance*** bio-diversity.

4.2 Trails, Overlooks and Trailhead Pocket Parks

4.2 A 1. Please Add New policy.

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

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

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

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

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

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

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

Please incorporate UCPG recommendation to remove the qualification "where possible"."[22]

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

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

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

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

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

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

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

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

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

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

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

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

4.2 M. Please incorporate UCPG recommendation to

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

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

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

5.6 Biological Resources

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

Edit typo, "vegetated."

5.6 A. Retain native vegetation and revegetate~~d~~ disturbed areas and open space with native, non-invasive, drought tolerant, and fire-resistive species to improve drainage conditions, reduce slope erosion and instability, and restore biological diversity. New development within or adjacent to the MHPA must comply with the MHPA Land Use Adjacency Guidelines.

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

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

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

5.12 Coastal Resources,

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

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

5.13 Area Specific Conservation and Open Space Policies

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

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

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

> **Please edit for clarity – Roselle Canyon *is* the canyon area between Campus Point and Towne Centre Drives.**
>
> **Language, "within scenic overlooks," is unclear. Is the policy designed to protect viewsheds or to promote development of scenic overlooks?**
>
> **5.13 B.** Preserve the scenic qualities of the surrounding coastal and canyon viewshed areas with~~in~~ scenic overlooks in Rose Canyon, San Clemente Canyon/Marian Bear Memorial Park, ***Sorrento Valley****,* and ***Roselle Canyon*** ~~and the canyon area~~ between Campus Point Drive and Towne Centre Drive.

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

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

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

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

5.13 E and F.

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

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

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

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

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

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

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

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

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

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

I.e., 5.13 H. ***Protect and r***estore Rose Canyon ecosystems ***and watershed*** habitats.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5.14 Sustainability

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

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

5.15 Energy Conservation:

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

I.e., 5.15 D. Incorporate measures to increase energy-efficient forms of transportation for commercial and industrial developments. Supply bicycle racks, showers, priority parking for carpools, bus stops with support facilities, ***charging stations for electric vehicles and bicycles,*** and other incentives.

5.16 Water Conservation:

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

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

X. Implementation

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

Recommendations:

- The UCPG recommends that the **Final UCP** provide a clearer, more transparent, and more robust explanation of how infrastructure and public facilities will be provided and paid for in support of projected growth.

- This should include a **clear explanation of how parks and bike infrastructure will be paid for**, how infrastructure at large will be paid for, and how land for parks will be acquired.

- The UCPG recommends that **the city study funding and implementation strategies** for infrastructure similar to the Keyser Marston analysis of affordable housing.

- This study should evaluate **supplemental strategies to provide infrastructure**, including: the potential for **Supplemental Development Impact fees** (a “Future Opportunities Fund” for parks and other infrastructure), **enhanced SDR’s** for parks, bike infrastructure, or other needed public facilities, Maintenance Assessment Districts,

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

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

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

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

University Community Planning Group

Comments for the University Community Draft Environmental Impact Report

March 14, 2024, SCH No. 2021070359

Approved May 14, 2024, by the UCPG

Submitted to the City of San Diego May 15, 2022

P 33. S4.2 (Alternative 2)

S.4.2 "Alternative 2" for the University Community is for INCREASED density and development above and beyond that recommended in the Draft Plan and is made without any specificity as to the visual impacts of that alternative, other than by virtue of comparison of square feet of commercial development and residential units. Its impact cannot be evaluated without specificity as to the development changes planned in the Alternative. With the additional development and increase in density/population put forth in Alternative 2 come additional adverse environmental impacts. The City's draft plan proposes 40,582,000sq ft of additional non-residential building in the University CPU (as opposed to Alternative 2 which proposes 46,582,000) and 30,480 new homes (as opposed to Alternative 2 which proposes 56,480). See DEIR p. S-6 and 3-50. ***The DEIR should explain how the conclusions for Alternative 2 were made without detailed analysis of that Alternative and specifically why the Community Discussion Draft's Community Scenario was not analyzed as an EIR Alternative. The DEIR should explain the criteria used to decide which Alternatives in the DEIR were analyzed.***

The UC Draft Plan and the DEIR fail to consider the fact that approximately 11,000 new "beds" have been built to house UCSD students on campus since the plan update process began more than 5 years ago and the pending Revision to the 2018 UC San Diego Long Range Development Plan, extending through 2040, will create 5,500 additional student beds with 3 projects. ***UCSD's housing development and anticipated future development needs to be analyzed for in the DEIR for its impact on the community.***

Additionally, the DEIR fails to consider any alternative with lesser development intensity or to set forth different developmental components which would minimize environmental impacts. Such alternative development and plan alternatives were recommended to the City by UCPG subcommittee in its proposed changes to the draft plan dated July 11, 2023, many of which the City failed to incorporate in the currently pending Draft Plan of March 2024. ***The DEIR should explain the criteria used in the selection of Alternatives to be analyzed.***

Furthermore, the University Community is an already densely developed area in both the commercial and residential context. UCPG questions the need for the housing density set forth in the updated plan. In its grant proposal to SANDAG to undertake the plan update, the City projected the need for 10.000-30.000 new residential units. the Draft plan now envisions doubling the current population with 65,360 new residents. However, the SANDAG Series 15 forecast projected a TOTAL of 65,345 new residents in all of San Diego by 2050. Incredibly, the City's Draft Plan for UC houses the number (Per SANDAG) of **ALL new residents predicted to move to San Diego by 2050** in the University community. See SANDAG Series 15 Forecast. https://www.sandag.org/-/media/SANDAG/Documents/PDF/data-and-research/socioeconomics/estimates-and-forecasts/sr-15-infobits-2024-04-01.pdf

Nowhere in the DEIR is the actual or projected need for the extent of stated development density proposed by the draft plan addressed or evaluated. In fact, With less development and less population the environmental impacts decrease.

P 36. S.5 (Aesthetics issue 1)

The University community has some of San Diego's largest areas of open, protected space and sensitive MHPA habitat. Its preservation and protection are both essential to the lifestyle in the community, and its draw to both residents and occupiers of commercial spaces, as well as mandated by law. The UCPG is concerned with construction of multiple story structures adjacent to canyons and open space without adequate setbacks or building transition line slopes. and open space is problematic for several reasons, only one of which is aesthetics. Such construction both blocks the scenic views/vistas of adjacent properties and cross-canyon neighbors, and it also destroys the natural beauty/views/vistas from within the open space and canyons. The significance can be mitigated in part with appropriate design measures as recommended by the UCPG: 30-foot setbacks with 45-degree transition plane angles. ***The DEIR should analyze the impacts of these two key parameters, setbacks and transition plane angles in building design on the environment of adjacent canyons and open space.***

P 37. S.5 (Aesthetics issue 3/4)

The University community has some of San Diego's largest areas of open, protected space and sensitive MHPA habitat. Its preservation and protection is both essential to the lifestyle in the community, and its draw to both residents and occupiers of commercial spaces, as well as mandated by law. The UCPG is concerned with construction of multiple story structures adjacent to canyon and open space is problematic for several reason only one of which is aesthetics. Such construction both blocks the scenic views/vistas of adjacent properties and cross-canyon neighbors, and it also destroys the natural beauty/views/vistas from within the open space and canyons. The significance can be mitigated in part with appropriate design measures as recommended by the UCPG, see above Aesthetics issue 1.

P 37. S.5 (Aesthetics issue 5)

The University community has some of San Diego's largest areas of open, protected space and sensitive MHPA habitat. Its preservation and protection are both essential to the lifestyle in the community, and its draw to both residents and occupiers of commercial spaces, as well as mandated by law. The UCPG is concerned with construction of multiple story structures adjacent to canyon and open space is problematic for several reason only one of which is aesthetics. Much more than an issue of aesthetics, it is an issue of survival for the habitat and endangers the continued existence of wildlife in these protected areas. Light and glare from both exterior and interior lighting from buildings adjacent to open/canyon space has a detrimentally impacts the wildlife as do windows which provide glare resulting in bird strikes. The significance can be mitigated in part with appropriate design measures as recommended by the UCPG, see above Aesthetics issue 1.

P 38. S-4 4.3 (biological resources issue 1, 3, 4, 5)

The University community has some of San Diego's largest areas of open, protected space and sensitive MHPA habitat and its preservation and protection are both essential to the lifestyle in the community, and its draw to both residents and occupiers of commercial spaces., as well as mandated by law. The UCPG is concerned with construction of multiple story structures adjacent to canyon and open space is problematic for several reason only one of which is light and glare from both exterior and interior lighting from buildings adjacent to open/canyon space which has a detrimentally impacts the wildlife as do windows which provide glare resulting in bird strikes. Access from one area of open space to another (i.e. wildlife corridors another is also key to the survival of wildlife. The significance can be mitigated in part with appropriate design measures as recommended by the UCPG: 30-foot setbacks with 45-degree transition plane angles. ***The DEIR should analyze the impacts of these two key parameters, setbacks and transition plane angles, in building design on the biological resources (wildlife, shading) of adjacent canyons and open space.***

P 44. S.5 - 4.7 (greenhouse gases issue 1 & 2)

The studies considered with respect to traffic data in support of the DEIR and Draft Plan are almost 10 years old and do not include conditions at high use times, nor on major thoroughfares. Without this information, complete analysis of climate effects is inadequately considered. The City's proposed Plan for UC needs to address this issue and the DEIR should explain the use of past data to project likely future impacts to its climate analysis.

Additionally, nowhere in the UC Draft Plan is there an assessment of the likely effect of our area's rapid movement toward alternative fuel vehicles, nor the infrastructure to support residential needs for powering such vehicles with a doubling of the population in the University area. The DEIR should explain how it projects the use of alternative fueled vehicles in its climate analyses.

The DEIR should study the transit propensity of projected residents to determine if transit will meet its goals under the climate action plan. Further, the DEIR should study the impact of many fewer residents than projected on meeting the CAP goals.

P 51. S.5 – 4.12 Public Services (Issue 1)

The DEIR fails to address the total lack of additional schools in the University Community. Additional pre-school, primary and secondary schools are imperative in an area which seeks to double its residential population. Not only does the City not have land within the community on which to build additional schools but there is no infrastructure/financial plan to begin even discussing such required development. As such the lack of plans for additional schooling makes is a substantial detraction from neighborhood "livability" particularly for families residing in the area. Specific plans to mitigate this significant impact need to be developed and addressed in the DEIR.

P 53. S.5 – 4.1 (recreation (issue 1)

The Draft Plan accounts for doubling the residential population in the University Community but lacks the ability meet that demand with adequate parks and recreational opportunities. By the City's own calculation there is a substantial park and recreation deficit in the University community and no city property to rectify the problem. At build out, there will be a deficit of 4,100 points, the equivalent of a lack of Parks for 41,000 persons according to the Park Master Plan. Additionally, parks need to be located where people live, not in remote areas that require a car or transit ride to reach them. The DEIR also notes a need for a total of 5.7 recreational centers and 2.8 aquatic complex to meet the City standards, acknowledges that the City lacks property on which to construct such facilities or resolve the deficit. These deficits contribute to making the University Community a less "livable" section of the City. ***The DEKR should analyze the effects of a substantial park deficit, and specifically the need to analyze the specific environmental impacts to the MPHA of improper use of this land in place of missing recreational opportunities in parks.***

P 55. S.5 – 4.14 (transportation)

The studies considered with respect to traffic data in support of the DEIR and Draft Plan are almost 10 years old and do not include conditions at high use times, nor on major thoroughfares. ***The DEIR should explain how the use of out-of-date traffic study data leads to accurate conclusions for current and future conditions.***

P 60. S.5 – 4.18 Wildfire

Doubling the population density within the already dense University community increases wildfire risk. Permitting the construction, particularly of multi-story buildings adjacent to canyon rims and/or open spaces increases wildfire risk. The proposed City plan and the DEIR examine only issues arising after a wildfire occurs. Both fail to create realistic fire PREVENTION measures in our brush exposures including mitigation by the City, on City property, requiring hardening of exteriors of structures, and/or setback requirements and other exterior fire protective measures which should be required to mitigate some of the risk in the event of a wildfire. ***The DEIR needs to address and include specific and adequate fire protective measures.***

P 90. 3.2.1.4

With respect to affordable housing, the draft plan anticipates the only financially feasible new housing construction will be in the higher range of "afford ability", of 81% of AMI or better. See Keyser Marston Associates Inc. March 2024 study for the City of San Diego,

The draft plan does not study, nor address the displacement of numerous lower income households currently residing in the plan area, which housing is slated for demolition/re-development and replacement with residential units available requiring a considerably higher income. ***The UCPG Plan update subcommittee specifically requested anti-displacement***

measures for this group of current residents but such was not incorporated in the proposed plan nor considered in the DEIR. **The DEIR should explain why this part of the housing element is omitted.**

Thus, people in the extreme low, very low- and low-income groups are essentially precluded from finding affordable homes in the University Community. It is people in those levels (individually and/or their families) who fill many of the lower paid jobs in the commercial and retail sector.... including biotech, life sciences and university jobs, who are and will be precluded from finding affordable housing in the university community.

Of the housing production needed in ALL of San Diego, according to the chart at 3.2.1.4, of the total of 63,156 new housing units needed above 81% of AMI. The city is apparently looking to place a disproportionate, almost 50% of those higher priced units (i.e. 30,480 new residential units per the draft plan) in the University community, rather than elsewhere in the City. That solution is inequitable. Not only will this elimination of lower priced housing in the UC community destroy the economic diversity of the area, but it will also have a significant NEGATIVE impact on one of the other goals of the draft plan (and which is critical to the city's infrastructure planning) .... which is to increase transit ridership and particularly use of the Blue Line Trolley. Higher income households are NOT those who typically ride public transit. More typical transit riders will be priced out of the University Community.

UCPG's proposals for creating affordable housing at all levels of income within the university community; avoiding displacement of lower income households; and requiring lower income units to be provided by developers on site have not been included in the plan nor considered in the DEIR and should be.

P 92. 3.3

CEQA guideline section 15124(b)(1) requires:

The description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact..... "(b) A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits."

As further discussed, several of the objectives/goals are not adequately considered in the Draft Plan for University. Those were specifically requested in UCPG plan update's recommendations for inclusion in the plan but were not included. Therefore, they have not been considered in the DEIR although they need to be addressed.

Services and amenities, such as retail and amenities near new residential development need to be required as they are in direct competition for commercial space with biotech and life sciences development.

There is a substantial deficit (lack of such for 41,000 persons) in parks and recreational facilities available NEAR anticipated dense residential development that is planned, and no means to create such due to the lack of City property to construct such. This needs to be remedied

-As discussed in response to DEIR section 3.2.1.4, the Draft Plan does not provide for" housing of all types and for all income levels in a manner that affirmatively furthers fair housing." To the contrary, the Draft Plan is inequitable. Additionally, the City's specific objective of "increasing affordable housing near biotech jobs and UCSD to retain talent with the City and prevent employees and students from leaving the community due to high housing costs" also fails other than for those with high paying jobs. ***The DEIR should explain how the impact of expected housing types projected in the Draft UC Plan may affect its analyses and conclusions (CAP, Mode Share, and transit use).***

P 136. 3.5.3

The housing contemplated by the UC Draft Plan in the University Community is that for income levels above 81% AMI. For the most part, it is not people at those incomes who are likely riders on the Blue Line or other transit. The more likely transit riders are those who will be priced out of the housing market in the University community. ***The DEIR should analyze the impact on transit projections of the household income distribution it expects in the plan area.***

P 136. 3.5.3. (Table 3-4)

This table demonstrates the deficiencies in the proposed UC Draft Plan with respect to education and recreation which need to be remedied. Although the Draft Plan adds 30,480 residential units there is ZERO increased development area proposed for new schools or recreation. Of equal concern is the fact that the city has no land within the University Community available for such construction. Doubling the residential community without also providing for development of schools and recreation facilities is shortsighted at best. ***The DEIR should analyze the environmental impacts of adding population without identifying additional, adequate, school locations.***

P 137. 5.3 (Table 3-5) (Residential build out)

The UC Draft Plan and the DEIR fail to consider the fact that approximately 11,000 new "beds" have been built to house UCSD students on campus since the plan update process began more than 5 years ago and the pending Revision to the 2018 UC San Diego Long Range Development Plan, extending through 2040, will create 5,500 additional student beds with 3 projects***. UCSD's housing development and anticipated future development needs to be analyzed in both the City's Plan for UC and in the DEIR.***

Additionally, the DEIR fails to consider any alternative with lesser development density or to set forth different developmental components which would minimize environmental impacts. Such alternative development and plan alternatives were recommended to the City by UCPG subcommittee in its proposed changes to the draft plan dated July 11, 2023, many of which the City failed to incorporate in the currently pending Draft Plan of March 2024. The DEIR should explain why the Community Alternative Plan (Community Discussion Draft of the UC Plan, April 2023), was not analyzed as one of the Alternatives in the DEIR.

Furthermore, the University Community is an already densely developed area in both the commercial and residential context. UCPG questions the need for the housing density set forth in the updated plan. In its grant proposal to SANDAG to undertake the plan update, the City projected the need for 10,000-30,000 new residential units. the Draft plan now envisions doubling the current population with 65,360 new residents. However, the SANDAG Series 15 forecast projected a TOTAL of 65,345 new residents in all of San Diego by 2050. Incredibly, the City's Draft Plan for UC houses the number (Per SANDAG) of ALL new residents predicted to move to San Diego by 2050 in the University community. See SANDAG Series 15 Forecast. The DEIR should explain how, environmentally, the higher-density dependent Alternatives studied would perform if only a fraction of the density is achieved under the new plan.

https://www.sandag.org/-/media/SANDAG/Documents/PDF/data-and-research/socioeconomics/estimates-and-forecasts/sr-15-infobits-2024-04-01.pdf

P 139. 3.5.3.1 (vision and land use framework)

See response to 3.2.1.4 on deficits in housing plan.

P 139. 3.5.3.1

See response to 3.2.1.4 on deficits in housing plan.

P 139. 3.5.3.1

The Draft Plan fails to require replacement or expansion of established shopping with grocery chains, or to add new shopping centers to accommodate doubling the community population, or to provide for smaller commercial service businesses in the community which cannot afford increased rents with new development (i.e. cleaners, drug stores, single practitioner medical services, nail salons, etc.). Retail spaces are left to compete for space with high end residential and with ever expanding biotech and life science developments. ***The DEIR should analyze the environmental effects of possible diminution of retail space in key locations in the plan area.***

P 139. 3.5.3.1

See response to 3.2.1.4

P 140. 3.5.3.1 (affordable homes requirement)

See 3.2.1.4

P 141. 3.5.3.1 (Urban Design)

Newly constructed or renovated office parks need to provide publicly accessible trails, paths, and outlooks on their property, not just “access to” or “connections with” open space land.

P 149. 3.5.3.1 (parks and recreation)

The Draft Plan accounts for doubling the residential population in the University Community but lacks the ability meet that demand with adequate parks and recreational opportunities. By the City's own calculation there is a substantial park and recreation deficit in the University community and no city property to rectify the problem. At build out, there will be a deficit of 4,100 points, the equivalent of a lack of Parks for 41,000 persons. Additionally, parks need to be located where people live, not in remote areas that require a car or transit ride to reach them. The DEIR also notes a need for a total of 5.7 recreational centers and 2.8 aquatic complex to meet the City standards, acknowledges that the City lacks property on which to construct such facilities or resolve the deficit. ***The DEIR should analyze the impacts of Parks deficits on the plan area’s significant MHPA assets; when there are inadequate Park facilities, people may (over)use Open Space parks with significant passive recreation restrictions.***

P 156. 3.5.1.3g.(Public Facilities, Services, Safety)

The DEIR fails to address the total lack of additional schools in the University Community. Additional pre-school, primary and secondary schools are imperative in an area which seeks to double its residential population. Not only does the City not have land within the community on which to build additional schools but there is no infrastructure/financial plan to begin even discussing such required development. As such the lack of plans for additional schooling makes is a substantial detraction from neighborhood "livability" particularly for families residing in the area. The UC Plan needs to provide a clear plan for financing and implementation to assure that proposed infrastructure can be paid for and implemented as a whole (not merely block by block). ***The DEIR should analyze the environmental impacts of an increasing population without identifying additional school locations, particularly on traffic due to more students without a local school.***

Additionally, throughout the plan, and particularly with respect to issues of infrastructure, public buildings, parks, and public services there is a complete lack of any consideration of what public funding will be required or available to implement the plan. Whereas much of the existing infrastructure and public improvements in University Community were paid for by fees charged to the initial developers in University, the Draft plan now anticipates that the residential and commercial development will DOUBLE without any assurance (and in fact, plans to the contrary) that the developer fees will be used for infrastructure, public buildings and/or services within the UC community. The UC Plan should provide a clear plan for financing and implementation to assure that proposed infrastructure can be paid for and implemented as a

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

Breakthrough PROPERTIES

May 6, 2024

Coby Tomlins
City of San Diego Planning Department
9485 Aero Drive, M.S. 413
San Diego, CA 92123

RE: Zoning Request for Governor Park: CO 3-3

Dear Ms. Tomlins,

Thank you for your team's input and guidance as Breakthrough Properties' explores potential future uses of our properties within the Governor Park business center in University City. Upon further discussion, **our firm would prefer a CO 3-3 zone at the site**, which is consistent with the March 2024 draft of the University Community Plan Update.

Please accept this letter as a rescission of our May 2 letter requesting a different zone for Governor Park.

Breakthrough Properties is supportive of the current CO 3-3 zone proposed for Governor Park and of the Community Plan Update as a whole. We appreciate your patience as we worked through this process. Please let us know if you have any further questions.

Sincerely,

Jonathan Parot
Senior Director, Development
Breakthrough Properties

May 03, 2024

Suchi Lukes, AICP
Senior Planner
planuniversity@sandiego.gov
City of San Diego, Planning
202 C Street, M.S. 413
San Diego, CA 92101

SUBJECT: Request to Revise Proposed Zoning Designation for APN: 3442801300

Ms. Lukes,

Village Square Apartments Del, LLC is the lawful owner of the property located at 8655 Via Mallorca, La Jolla CA 92037 (APN: 3442801300). This letter serves as the official request to the City of San Diego for the revision of the rezoning designation of this property, as proposed in the Draft University Community Plan Update (CPU), dated March 2024.

To confirm, the existing zoning designation of APN: 3442801300 is the Commercial-Community Zone CC-1-3. Also, the current Draft University CPU proposes to rezone the property to the Employment Mixed-Use Zone EMX-2.

Village Square Apartments Del, LLC is requesting that the City revise the proposed rezone designation of the property in the Draft University CPU to the Mixed Use Base Zone RMX-2.

The RMX-2 zone is preferred because the property is currently developed with a fully residential use that contains no commercial uses. As the RMX-2 zone has the primary use to be residential, it will assist in reaching the goal of providing the maximum amount of housing.

As this letter is only a request, please contact our Owner Representative, Patrick Zabrocki at pzabrocki@wermersproperties.com or 858-245-2473 to confirm receipt of this letter and provide feedback for the next steps to further this request into an actionable revision. Thank you for your consideration.

Respectfully,

Gerry Ranglas
Village Square Apartments Del, LLC

From:	Tomlins, Coby
To:	Lukes, Suchitra; Causman, Nathen
Cc:	McGee, Sean
Subject:	FW: UC CPU SDR comments
Date:	Friday, May 3, 2024 12:38:46 PM
Attachments:	Garden UC CPU SDR Comments.pdf

Hi team,

Please see attached for review.

From: Michael Hansen <michael@cityforwardfirm.com>
Sent: Friday, May 3, 2024 11:17 AM
To: Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>
Cc: Stuart <stuartp@gardencommunitiesca.com>; Ari Astalos <aria@gardencommunitiesca.com>; jakep@gardencommunitiesca.com; Stephanie Saathoff <stephanie@theclayco.com>; Matthew Geaman <mgeaman@jwdainc.com>
Subject: [EXTERNAL] UC CPU SDR comments

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

Hi Tait and Coby,

Thank you for the time on Wednesday to go over Garden's comments on the UC CPU. Attached are our specific SDR follow-up comments.

On Wednesday we discussed potential unintended consequences of the current way public space size is calculated. This is especially true for sites where "premises" may not have a strong relationship to actual development footprint.

It's also important to us that the SDRs apply fairly to multi-phased development. There are sites in UC where most of the premises is already developed. There are also larger sites where development is planned over several phases and many years. The public space requirement should not be calculated based on prior development or on future uncertain phases.

If you have any questions about these comments, please let us know. Thanks for considering our input.

Mike

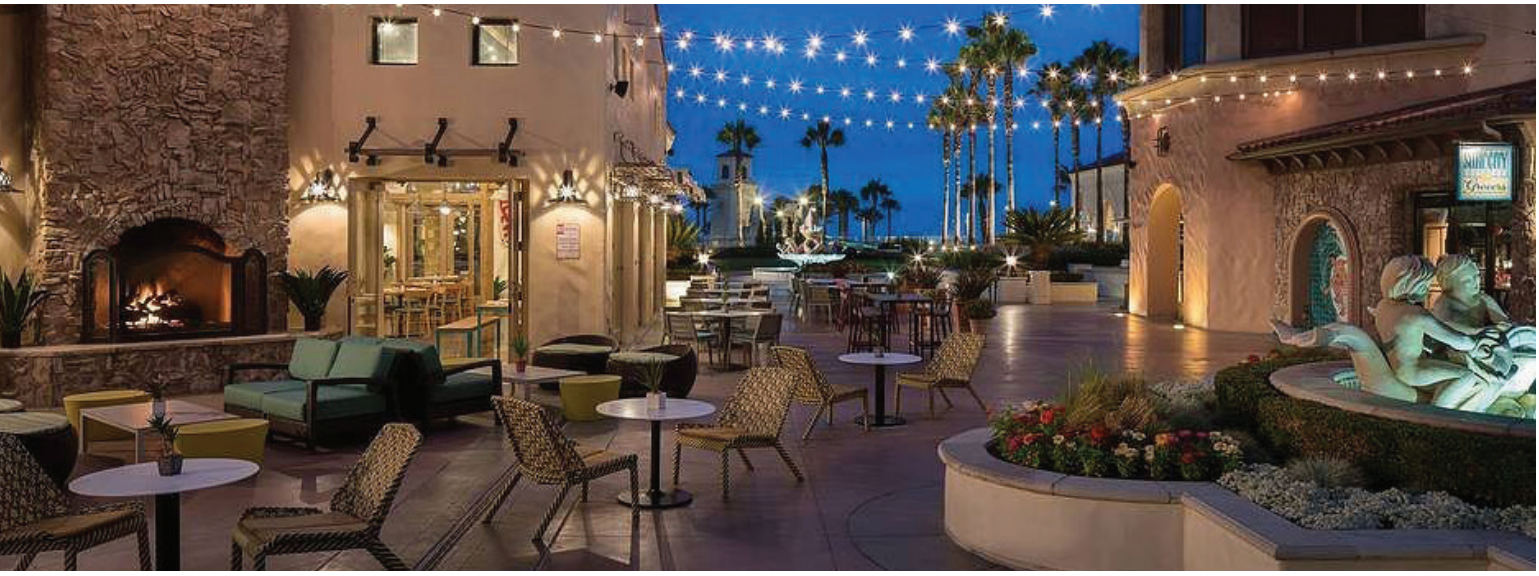
Michael Hansen, AICP
City Forward LLC

p: 619 944 6590
w: cityforwardfirm.com

Table 2 Public Space Amenity Types[1]		
Amenity Type	**Required Amenity Features**	**Category[2]**
All-Weather Shade Cover/ Pavilion with Tables and Seating	One all-weather shade cover/pavilion measuring 400 square feet or greater, with a minimum of two sets of fixed or movable tables and chairs. Shade covers shall not replace appropriate tree plantings or count toward tree canopy coverage.	1
Community Garden	A community or native demonstration garden containing at least 10 plots with a minimum of 100 square feet of soil area per plot, as well as a water meter and access to water.	1
Interactive/Technology Element[3, 4]	A piece of interactive or technology element (publicly accessible Wi-Fi, solar panel furniture/feature, touchable information board, smart kiosks, etc.) that is accessible to the public.	1
Multi-Purpose Turf Area	A minimum of 10,000 square feet of continuous turf with minimal sloping to support universal access.	1
Off-Leash Dog Area	A minimum of 2,000 square feet of fenced-in, off-leash dog area.	1
Placemaking Elements [3, 4]	A minimum of two (2) placemaking elements such as free library stands, decorative lighting, interactive art, interactive playscape, climbing walls, elements of historical or cultural relevance, community activation elements/games, gathering areas, multi-functional "centerpiece" furniture, or similar.	1
Play Area	A minimum of 750 square feet with children's play equipment and safety surfacing. Separate play areas should be provided for kids ages 2-5 and 5-12. A minimum of three (3) play pieces shall be provided per play area.	1
Fitness Circuit[3]	A minimum of three (3) pieces of fitness equipment with clear signage. Circuit equipment must be accompanied by a connecting path.	1
Plaza or Performance/Event Space[3]	A minimum of 2,500 square feet of paved area with seating, lighting and utilities (power, data, sound).	2
Splash Pad[3]	A Splash Pad (otherwise considered a "water playground") measuring a minimum of 750 square feet.	2
Sports Court with Lighting	A minimum of one (1) full court or two (2) half-courts for sports such as basketball, tennis, pickleball, or sand volleyball. Lighting shall be provided, and shall be sited and directed to minimize impacts to nearby residential uses.	2

[1] All amenities shall be open and available to the public from at least 8:00 a.m. to 8:00 p.m. year-round or during hours of business operations.
[2] Amenities in category 2 shall satisfy two single amenities requirements.
[3] *Development* shall not utilize this specific amenity more than once.
[4] An alternative compliance determination will be made by the Planning Director for amenities not listed in Table 2.

Ample seating opportunities make public spaces more enjoyable.



SDR-A.2 Required Public Spaces Regulations.
All required *public spaces* shall comply with the following:

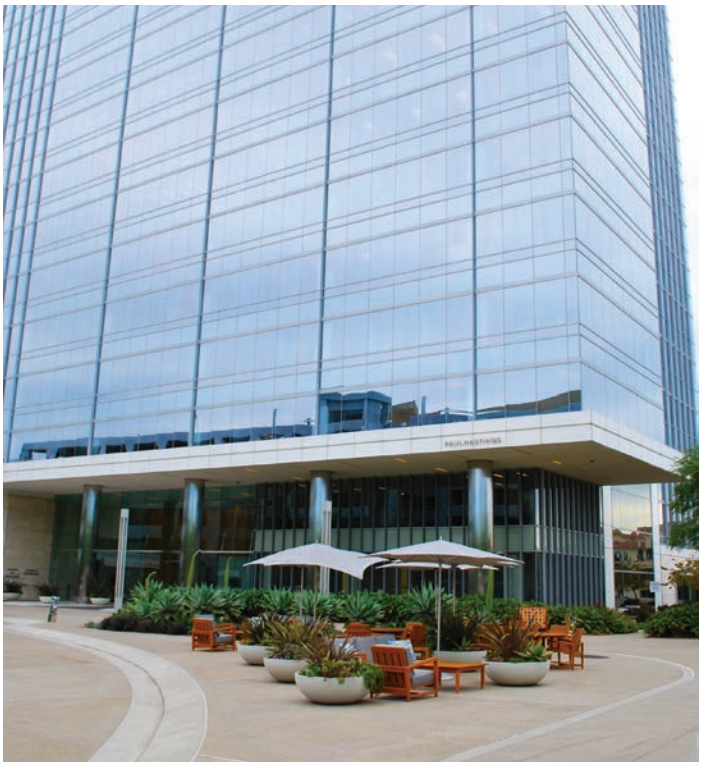
1. Public Space Type. An applicant can choose to satisfy its *public space* requirements under SDR-A.1 through the provision of one or more of the following *public space* types: *plaza*, *promenade*, *podium* or *platform*.

   a. A *plaza* shall meet the following requirements:

      i. The minimum area shall be 1,250 square feet;

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

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



Example implementation of a plaza.

   b. A *podium* shall meet the following requirements:

      i. The minimum area shall be 3,000 square feet;

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

      iii. Pedestrian access shall be provided from the ground level;

      iv. At least one building entrance shall be provided from the *podium*; and

      v. A pedestrian connection to a pedestrian bridge shall be provided where the development is adjacent to a pedestrian bridge. (See Figure 37.)

Example implementation of a podium public urban space.

c. A *platform* shall meet the following requirements:

i. The minimum area shall be 1,500 square feet;

ii. The minimum length and width shall be 15 feet;

iii. At least one pedestrian connection shall be provided between an elevated light rail station and the adjacent *development*;

iv. Pedestrian access shall be provided from the ground level; and

v. At least one building entrance shall be provided from the *platform*. (See Figure 38.)

Example implementation of how a transit facility can have a seamless integration with a plaza-like area. - Photo: Community Design + Architecture

d. A *promenade* shall meet the following requirements:

i. The minimum width shall be 20 feet measured perpendicular from the *parkway* to the *street wall*; and

ii. The minimum width shall be 10 feet free of obstructions at any point. (See Figure 39.)

Example implementation of how a promenade can be implemented, even with a change in grade.

e. An *urban green* shall meet the following requirements:

   i. The minimum area shall be 3,000 square feet; and

   ii. The minimum length and width shall be 30 feet. (See Figure 40.)

Example implementation of an urban green.

2. Adjacent Building Façade. A minimum of one building façade shall face the *public 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 a commercial or residential uses.

   b. The abutting public space shall be accessible from the adjacent building entrances as follows:

      i. Each commercial retail tenant space or residential dwelling unit; or

      ii. A building's common area for buildings without retail tenant space or residential dwelling units.

   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*.

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*.

4. Pedestrian Circulation. The pedestrian circulation system for the *development* shall include a minimum of one connection to the *public space*.

5. Setbacks. The *public space* may be located in the required setbacks and may front the *property line*.

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.

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.

   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.

9. Landscaping.

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

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

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

   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.

10. Design.

    a. Lighting shall be provided on either poles or bollards at the entrance, pedestrian pathways and edges of the *public spaces*;

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

    c. A minimum of 50 percent of the *public space* shall be free of physical barriers or obstructions to ensure universal access;

    d. *Public spaces* shall provide pedestrian connections to the abutting *throughway zone* and building entrances; and

    e. A trash and recycling container shall be provided at a minimum of one for every 100 linear feet of *public space* that abuts a throughway zone.

    f. Patios, tables, and seating operated by on-site commercial tenants may be included within the *public space* if they are accessible to the public and are limited to no more than 20 percent of the *public space* area.

11. Parking structure entrances, driveways or passenger drop-offs are only permitted within a *public space* if the *premises* does not have access to another public right-of-way, subject to the satisfaction of the City Engineer.

12. Automobile parking spaces, loading berths/zones, trash storage facilities, utility boxes, as well as the access or service for these facilities are not permitted within the *public space*.

Breakthrough PROPERTIES

May 1, 2024

Coby Tomlins
City of San Diego Planning Department
9485 Aero Drive, M.S. 413
San Diego, CA 92123

RE: Zoning Request for University Community Plan Update

Dear Ms. Tomlins,

Breakthrough Properties is a life sciences developer that owns two office buildings at 6200 and 6220 Greenwich Drive in the Governor Park business center of University City. We have followed the University Community Plan Update process for the past several years and are writing to provide comments on the recently released March 2024 draft.

Our two properties within Governor Park are currently zone IP 2-1, which allows for a full range of life science research and development uses that meet the needs of our prospective tenants. The recent March 2024 draft proposes to change the center's zoning to CO 3-3. This new zone, while allowing for some research and development activity, is primarily intended for traditional office use. Breakthrough Properties is concerned this proposed CO 3-3 zone is less compatible with our future plans for the site. Our firm also recognizes the significant housing challenges facing the region and is exploring the possibility of including residential uses on our property as well.

As a result, **we request the City maintain the current IP designation at Governor Park and update the zone from IP 2-1 to IP 3-1 to allow the potential for residential uses.** This change to IP 3-1 would allow the City to accomplish both its Community Plan Update and Housing Action Plan objectives while supporting the continued growth of our City's thriving life sciences industry.

Thank you for considering this request and for all the hard work it has taken to get to this point. Pending our proposed change, Breakthrough Properties is otherwise fully supportive of the direction this plan is heading and looks forward to its ultimate approval by the City Council later this year.

Sincerely,

Jonathan Parot
Senior Director, Development
Breakthrough Properties

Hello, April 2024

I have been a resident of University City for over a decade, and have grown up in this community, attending the local middle and high schools here. I urge you to listen to my fellow community members as you consider the expansion of high density building projects that will significantly affect our thriving community.

Of the many things I have enjoyed living here, such as the community, and the people, the most important has been the access to so many vital resources. It is necessary for a thriving community to have access to stores that sell fresh produce, open community spaces, and the ability to easily access services such as pharmacies, coffee shops, grocery stores, the post office, the library, as well as public transit. Currently, residents already have access to all these resources, and for many, they are only a short walk or bike ride away.

It is clear that San Diego needs more housing, and critically, that it needs more housing which is accessible to the people that live and work here. However, I do not believe that building high density units in our existing marketplaces, or re-zoning existing family homes to allow developers to build high density housing is the solution. University City has already seen an increase in these types of high density developments, such as the newer apartments built at the UTC mall, or the Costa Verde shopping complex. These projects increased units, but did not add accessible housing units for young professionals or UCSD students as developers would like to tout, these 'luxury' apartments are priced so that they are still out of reach for most young adults in San Diego, even out of reach of a traditional two-income household of established professionals.

It should not be ignored that the University of California, San Diego is a business, and that it benefits hugely from increasing its base of undergraduate students, particularly undergraduate students that come from out of state, paying well over two times the tuition of in-state undergraduate students, and many of whom would be in need of additional housing. Should UCSD choose to expand their classes with undergraduate students who would require this additional housing, they should also be willing and able to accommodate them on their already expansive campuses and satellite properties.

Building more housing should not come at the expense of communities that are thriving and already include the key components that are needed for a healthy community such as a sense of belonging, the ability to gather in outdoor spaces, access to walk and exercise outside safely, and access to stores that sell affordable, healthy, fresh produce. Simply re-zoning communities, without regard to the actual impacts of new, high density building projects on the existing community members and community resources, or true impact on accessible housing will have a significantly negative, even devastating effect on our community.

As a resident of University City, located in one of the areas directly of focus for potential re-zoning and the allowance of high density building, and also as a young professional who is invested in the long term health of communities like University City, as well as other communities who are significantly more under-resourced and under-invested in San Diego, I urge you to reconsider the development plans that would increase high density units at the expense of our vital shopping centers, businesses, family homes, and thriving, well connected community, while at the same time failing to guarantee truly accessible housing units.

I appreciate your time and your consideration.

Thank you,

Neha Bharti, University City resident

New Population Forecast Shows San Diego County Has Already Met Its 2050 Housing Goal

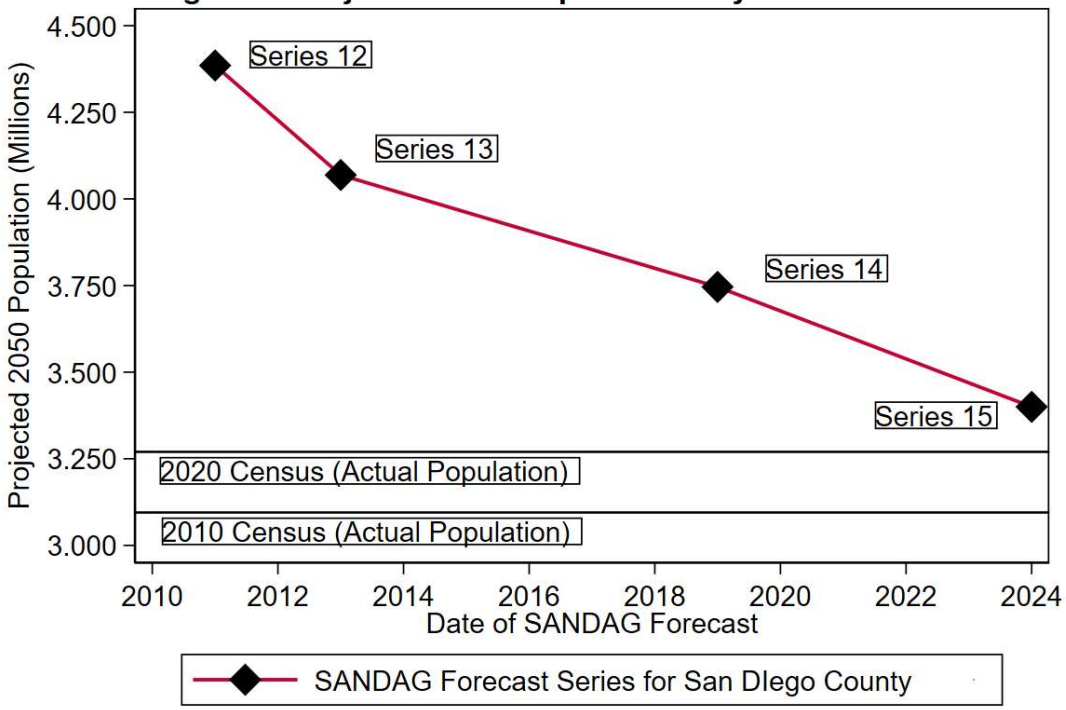
Richard Carson[1]

Has San Diego County already built enough new housing units to accommodate all the currently projected population growth through the year 2050? This is a stunning question to ask given the frenzied rhetoric about needing to build large numbers of new units of every type, everywhere to deal with what is widely perceived as a massive housing shortage by politicians, housing advocacy groups, and the public. The answer is YES.

A new demographic reality has become firmly established with each successive update of the 2050 population size forecast for the County of San Diego. The increase in the County of San Diego's population between 2010 and 2050 was originally forecasted (2011, SANDAG Series 12) to be about 1.3 new residents (births – deaths + net migration]. Over time, the forecasted 2050 population has steadily fallen as fertility rates continued to decline, increases in life expectancy stalled out, and net migration into California turned negative starting in 2015. The recent 2024 California Department of Finance AND SANDAG (2024, Series 15) forecasts put the projected increase in San Diego's population between 2010 and 2050 at around 300,000. Roughly 60% of that projected increase growth (about 175,000 new residents) already occurred between 2010 and 2023. Thus the current 2050 forecast suggests San Diego County will add another 125,000 new residents between 2024 and 2050.

Figure 1 shows the decline over time in the SANDAG 2050 population forecasts along with the actual 2010 and 2020 U.S. Census Bureau counts. The bankruptcy of relying on the earlier SANDAG forecasts is most evident by noting the fact that they grossly overestimated the now realized 2020 San Diego County population.

Figure 1: Projected 2050 Popululation by SANDAG Forecast



[1] Distinguished Professor of Economics, University of California, San Diego. April 29, 2024.

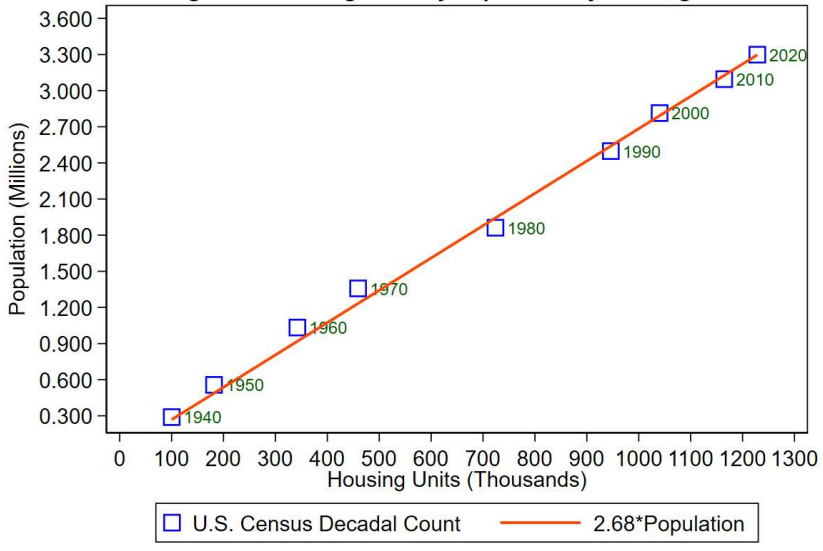
How many housing units need to be built for the 300,000 new residents projected to materialize between 2010 and 2050? To make that calculation, one other piece of information is needed, the average number of persons-per-housing-unit (PPHU). Let's take this PPHU number from SANDAG's Series 13 forecasts that underlies the City of San Diego's aggressive plan to build more housing. It forecasted 973,000 new County residents. (down about 300,000 from SANDAG's original 2050 population projection). That report also projected the need for 333,000 additional housing units. Dividing 973,000 people by 333,000 housing units yields the needed number, an average 2.92 PPHU for the expected new County residents. Replacing the 973,000 (Series 13) 2050 forecast with the current (Series 15) forecast of 300,000 additional residents and then dividing by 2.92, produces the number of additional housing units required between 2010 and 2050: 103,000.

Between the 2010 Census benchmarked number of housing units to its 2020 counterpart, San Diego County housing units by increased about 64,000. In the four years since, the Federal Reserve Board reports that about 40,000 building permits have been issued in the greater San Diego metropolitan area. Adding the 64,000 units built between 2010 and 2020 to the 40,000 units started over the last three years, yields 104,000 additional housing units, just above the 103,000 forecasted to be needed by 2050.

Thus the current 2050 San Diego County population forecast (and by extension constituent cities) coupled with the current housing inventory, shows that the State of California's legal mandate to provide housing units to accommodate projected growth has already been met. And not just now, but all the way through 2050. What about after 2050? Projections show San Diego County's population continuing to fall slowly from its early 2040's peak (close to the 2050 projection) through 2060, when California and U.S. projections suggest continuing decline.

Issue might be taken with the 2.92 PPHU assumption for newly built housing units. It is larger than the 2020 Census' 2.69. Since 1940, on average one housing unit per 2.68 residents has been provided over an 80 year period. There are small deviations, most recently a dip due to the Global Financial Crisis. Figure 2 displays this relationship. Using the 2.68 average PPHU is inconsequential, though, with the need unit numbers likely satisfied early next year..

Figure 2: San Diego County Population By Housing Units



A frequently heard contention is there is a need to catch up on building housing units because San Diego systematically underbuilt during the Global Financial Crisis. San Diego has caught up from that deficit because the County's population declined by almost 30,000 people since 2018, while construction continued at a brisk pace with building permits pulled for over 50,000 housing units. When the immediately previous 2050 population forecast (SANDAG Series 14) fell (again) by over 300,000 people, SANDAG tried to float the notion (making dubious assumptions and overruling its professional staff) that the County's PPHU would fall dramatically toward San Franciso like levels to prop-up the housing need estimates. This was done in part by emphasizing the projected increasing fraction of the population over time who are at or above retirement age. But the Hispanic population fraction is also expected to grow over time and that segment has a relatively high PPHU. Housing units near the urban core tend to be smaller with lower PPHUs. Those further out where much of the building occurs tend to be larger with larger PPHUs. All of San Diego's surrounding counties have somewhat higher 2020 Census PPHUs and the California Department of Finance latest authoritative forecast pegs San Diego County's 2030 PPHU at 2.76, right between the County's current average and its original 2.92 PPHU assumption for those occupying the new units.

The absurdity of acting as if the massive number of new San Diego residents envision by the earlier SANDAG population forecasts is nowhere more evident than in the controversial new plan for the area where I live University City. It envisions authorizing the building of around 30,000 more housing units and supporting infrastructure by 2050. Think about that. University City is being asked to undertake a comprehensive planning effort on how to accommodate more than half of the entire population growth now anticipated for the whole County between 2024 and 2050. It is difficult to think about requiring more practically useless and more socially destructive exercises that pit housing advocates against long-time community residents.

San Diego County and its constituent cities need to put all of these updates to community plans on hold until the deep implications of a long term future with a sharply smaller population than was earlier anticipated are fully digested by political leaders and the public. It is important to plan for the region's likely future, not one that now constitutes an alternative reality unmoored to demographic facts on the ground.

This is to say there are not real housing issues causing many in the region considerable pain. But there is no serious academic research showing that building sizeable numbers of housing units, almost exclusively at the high end of the market, makes housing more affordable over time period relevant for current residents seeking relief from having to spend a large fraction of their income on housing. That is because the process of housing filtering down to a level affordable to lower income households is quite slow and, perhaps as important, is interrupted by encouraging in-migration by the well-heeled. Further, while the homeless population is concentrated in major west coast cities with high housing costs, that population is not very responsive to changes in housing costs, as would be expected if housing cost were the major causal factor. These are issues that have to be tackled directly rather than hoping they will mysteriously go away by encouraging developers to engage in a large scale build out of existing communities to accommodate population growth that is no longer coming.

To Whom It may Concern:

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Planning Deficiencies in Parks

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Carmella Cotta

La Jolla City Club

April 28, 2024

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April 29, 2024

Via Electronic Mail Only

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

Re: Comments on the Draft University Community Plan and Local Coastal Plan (March 2024)

Dear UCP Project Manager:

This firm represents Friends of Rose Canyon in matters related to the University Community Plan and Local Coastal Plan Update ("UCP/LCP Update" or "UCP") and the adoption of Blueprint San Diego, the City's General Plan Update. In conjunction with this comment letter on Draft UCP, this firm has also submitted comments on the Draft Blueprint San Diego General Plan Update ("Blueprint SD") and the Draft Program EIR for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update ("Draft PEIR"), both also dated April 29, 2024. In some cases, this letter will refer to these other comment letters for background and context.

Friends of Rose Canyon is a community-based organization dedicated to the protection, preservation and restoration of Rose Canyon and the Rose Creek watershed. It has an active Board of Directors and dedicated membership base. Since 2019, Friends of Rose Canyon Executive Director Deborah Knight has participated in the University Community Plan ("UCP") Update Subcommittee, which the City convened to include resident, business and non-profit organization representatives in the discussion on updates to the UCP. This Draft UCP is the result of comprehensive work from staff, consultants, and community members that have been engaged in the process over the course of the last five years. In this process, and as reflected in the Draft UCP, there are some notable achievements that protect valuable open space and natural resources, among them:

- Adding a number of additional parcels into the Multi-Habitat Planning Area (MHPA) and making them 100% conserved Multi-Species Conservation Plan (MSCP) lands (some in Rose Canyon and some further north in Roselle Canyon). The University Community Planning Group unanimously advocated for protecting these parcels for many years. These parcels are noted in the Draft PEIR (Figure 3-28), however, this figure is not shown in the UCP.
- Dedicating (not simply designating) those parcels as open space pursuant to San Diego Chapter Section 55 to best protect them from a change of use, as shown in UCP Figure 29.
- Adding park space at the dead ends of Regents Road on the north and south side of Rose Canyon to create a desirable community amenity.
- Removing the outline of former Regents Road right of way across Rose Canyon and making the land under it 100% conserved MSCP.

Despite the laudable actions described above, Friends of Rose Canyon remains concerned about other aspects of the Draft UCP, including:

- The premature identification of new trails in Rose Canyon Open Space Park and other sensitive habitat areas within MHPA lands;
- Impacts to sensitive habitat areas from future canyon-adjacent development resulting from the removal of policy language that was in the Discussion Draft UCP. The previous version of the Draft UCP required a 50' setback, building transitions of 45 degrees, locating the long end of the building away from the canyon rim, and avoiding reflective glass facing the canyon.
- Lack of policy commitments or plans related to management, monitoring and enforcement of activities in MSCP lands in order to prevent further habitat damage; and
- Ensuring accurate rezoning for all parcels that should be in the MHPA.

This is not our first correspondence on these matters. On August 12, 2022, this firm provided a comment letter to Planning Director Heidi Vonblum regarding the "Draft Proposed Trails Network" that was presented at the July 21, 2020 meeting of the University Community Plan Update Subcommittee. In this letter, provided again as Attachment 1, we note that proposing new (or formalizing illegitimate) trails within Rose Canyon, or other MSCP-designated properties, as part of the UCP Update, is premature

under both State law and City policies. However, the Community Discussion Draft UCP was released in April 2023 with Current and Potential Trail Facilities (Figure 24) showing the same infeasible and insupportable trail locations as presented in 2020. This firm provided a comment letter dated June 30, 2023 on the Community Discussion Draft, *again* urging the City to remove new trail locations from the UCP and providing ample legal, policy, and practical justifications for doing so (Attachment 2). Unfortunately, the Public Review Draft UCP Update was released on March 14, 2024 with the Current and Potential Trail Facilities (now numbered as Figure 27) largely unchanged.

In fact, trail locations are identified liberally throughout the Draft UCP, including on all the pages identified in Attachment 3. For several marked new trails, the UCP notes that the exact location will be determined later. But it is not feasible to place *any* trail within the areas marked for the topographic, biological, and legal reasons discussed in this letter. As part of our comments on the Community Discussion Draft UCP, we provided an annotated version of Figure 24 and identified each trail that should not be included in the UCP and described why in our June 30, 2023 letter. We have updated these annotations on Figure 27 and have included them again as Attachment 4 to this letter.

After release of the Draft UCP, City Staff acknowledged in email correspondence that they were intending to remove proposed/existing informal trails from Figure 27 in the Draft UCP (formerly Figure 24). However, no updated/reissued Figure 27 has been published by the City to confirm this email correspondence. The City should remove <u>all</u> proposed new formal and informal trails from all pages in the Draft UCP. Attempting to consider new trails as a part of this process has shortcut necessary MSCP consistency and biological analysis and will only lead to further conflict and confusion.

I. New, Enhanced, or Newly-Formalized Trails Should Not Be Shown on Any Exhibits or Identified in any Tables in the UCP.

New trails cannot be shown in the UCP for the following reasons:

- The City cannot propose new or expanded uses within the UCP's MSCP lands because the City has not yet completed Natural Resource Management Plans for these areas, as required by the MSCP;
- The proposed trails shown on Draft UCP Figure 27 are inconsistent with policies about where to locate trails within the MSCP;
- The City's Parks Master Plan requires that a Trails Master Plan and associated environmental assessment of MSCP lands be completed before trails can be proposed;

- The proposed trails shown in Figure 27 will have significant biological impacts (see expert letters from biologist Robert Hamilton, Attachments 5 and 6); and
- The proposed trails are infeasible because of steep slopes, sensitive habitat, and other locational issues.

This firm's comment letter on the Draft PEIR, dated April 29, 2024 and authored by Attorney Heather M. Minner, clearly explains why all new, enhanced, or newly-formalized trails should be removed from the UCP, and supplements the points raised herein.

II. The City Must Complete a Natural Resources Management Plan for Rose Canyon, as Required by the MSCP, and adopt a Citywide Trails Master Plan Before Proposing New Trails in MSCP Lands.

The Parks Master Plan requires the City to take additional steps before any new trail locations can be proposed for sensitive areas, including Rose Canyon. Specifically, the City must first engage in the planning process committed to for a Citywide Trails Master Plan. Policy CSR 25 from the Parks Master Plan states that the City shall: "Develop, adopt, and update a Citywide Trails Master Plan to guide the provision and enhancement of open space multi-purpose trails that accommodate pedestrians, hikers, bicyclists, mountain bikers, and equestrians, where appropriate, and to provide safe and convenient linkages to parks, recreation facilities, and open space areas consistent with policies PP10, CO3, CO10, CSR16, and CSR22. A Trails Master Plan shall include *a set of criteria and guidelines for evaluating and establishing thresholds of access and use for Open Space parks that prioritize habitat management planning and other requirements in ESL policy and MSCP obligations in advance of specific trails planning*. These criteria and guidelines will reflect and encompass the current science of recreation ecology." (italics added for emphasis)

Table 7 in the Draft UCP (pages 212-213) identifies Rose Canyon Open Space Park as one of the City's Regional Parks and Open Space facilities. Table 7 correctly notes that "The future Citywide Trails Master Plan will comprehensively plan trail and open space park planning that complies with MSCP consistency findings, Environmentally Sensitive Land regulations, and Natural Resource Management Plans before being formally proposed for City evaluation and funding (see Parks Master Plan policies PP10, CSR25 and RP5)." However, it goes on to include a recommendation to "Design and construct trails that comply with the MSCP consistency findings, Environmentally Sensitive Land regulations, and Natural Resource Management Plans." Since it has not been determined if new trails in Rose Canyon can be consistent with the MSCP, it is premature to include

a recommendation to design and construct new trails in Rose Canyon Open Space Park. Instead, the recommendation for Rose Canyon should focus on improving the existing conditions of the MHPA lands and enforcement to protect the existing habitat from further damage. The recommendation should also address closing existing informal trails through MHPA lands.

Furthermore, the table should not include a "Proposed Recreational Value", which suggests that additional facilities are forthcoming. As described above, that is not yet known. Regardless, the Draft PEIR that covers the Draft UCP Update notes that value standards are not intended to be applied to open space parks such as Rose Canyon. *See* Draft PEIR p. 4.13-5.

To propose new trails in Rose Canyon and other MSCP lands in the UCP before criteria and guidelines for prioritizing habitat management and other MSCP obligations have been developed through the Trails Master Plan runs counter to City policy, responsible planning, and good stewardship practices of the City's recognized open space resources. This comprehensive review is critical. It will allow the City (with community input) to make informed decisions about what can and should be prioritized in order to provide the necessary habitat quantity, quality, and habitat connectivity and the necessary resources for monitoring, management, and enforcement to support the viability of San Diego's unique biodiversity.

The Draft UCP notes that "trails and recreation on lands subject to the Multi-Habitat Planning Areas ("MHPA") should comply with the MSCP for compatibility. For adjacent areas not deemed sensitive, there are opportunities to improve existing trail systems and pedestrian connections for public use to better promote active and passive recreation. However, development not in compliance with MHPA policies is not allowed within the MHPA (refer to the Parks Master Plan section on Conservation, Sustainability, and Resilience Policies for more information)." *See* UCP at 130. Further, the Parks Master Plan (PMP) section on Conservation, Sustainability, and Resilience referenced above contains additional policies that support the prioritization of MHPA protections and allowing recreation *if and when* habitat is not jeopardized. These include Policy CSR 25 (noted previously in this letter), which calls for "criteria and guidelines for evaluating and establishing thresholds of access and use for Open Space parks that prioritize habitat management planning and other requirements in ESL policy and MSCP obligations in advance of specific trails planning."

To reflect these MSCP requirements, text on following pages of the Draft UCP should be amended:

- Page 124: "Open Space Canyons are City-owned lands located throughout the City, consisting of canyons, mesas, and other landforms. Most of the open space canyons are MSCP habitat preserves and have specific conditions for public access and type of use. This open space is intended to preserve and protect native plants and animals, while providing for compatible public access and enjoyment."
- Page 141: "[T]he approximately 8,676-acre University community area supports a variety of vegetation communities and land cover types in its open space including both upland and wetland vegetation communities. The majority of these open space areas are subject to compliance with the City's MSCP Subarea Plan where ~~preservation balances the protection of~~ natural resources must be preserved, with the allowance of public passive recreation only where compatible with that mandate."

III. The Proposed Trails are Inconsistent with the MSCP Subarea Plan Policies or are Otherwise Infeasible.

City Staff has noted that the informal trails identified in the Draft UCP were shown by mistake and they are intending to remove them. However, because no steps have been taken to do so, this letter restates Friends of Rose Canyon's position on all of the trails currently shown in the Draft UCP and restates the reasons why including them is a violation of the City's own process. This firm's companion letter on the Draft PEIR that covers the Draft UCP Update, provides specific detail on the legal, procedural, and environmental failings of including the proposed trails without adequate environmental analysis.

Despite failing to conduct any type of analysis for consistency with the MSCP, the Draft UCP continues to blindly propose areas for new and formalized trails. Figure 27 of the UCP shows the "Existing Formal Trail" in Rose Canyon, which is the only approved trail in the Rose Canyon Open Space Park. Figure 27 identifies several additional, problematic types of trails: "Proposed New Trail (location to be determined)" and "Existing Informal Trail, Proposed as a Formal Trail." Most of these trails would require extensive grading and/or intrusion into sensitive habitat, and construction of them would run counter to the Management Directives of the MSCP.

A Biological Resources Report was prepared in June 2020 as part of the UCP Update ("Bio Report"). This report was updated in March 2024 (Appendix D to the Draft PEIR), but it did not examine any of the areas within the UCP in detail or evaluate the proposed tails in the Draft UCP. As noted in the comment letters provided by Robert Hamilton

dated June 29, 2023 and April 27, 2024 ("Hamilton letters," Attachments 5 and 6), the report contains broad information regarding the regulatory environment, an incomplete compendium of sensitive species that could exist in the Plan Area, and a summary of existing conditions. Yet, even the high-level summary of existing conditions in the Bio Report and the most cursory assessment of topographic conditions indicates that the proposed trails will conflict with the MSCP's conservation mandates or are otherwise infeasible. Many of the proposed trails would also conflict with policies in the Draft UCP recognizing the need to respect hillside and canyon areas and to avoid degradation to these areas. The UCP contains policies that identify the need to preserve topography and minimize grading, which would be impossible to accomplish given the locations of several proposed trails in steep canyon areas. For example, UCP Implementation Policy 5.4A states, "Prevent development, grading, or alterations of steep slopes greater than 25 percent grade or in open space canyons." All of the proposed trails discussed below are in steep open space canyons, so by the UCP's own policy guidance, these trails should not be considered.

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

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

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

B. The Two Blue "Proposed New Trail, location to be Determined" Sections in Rose Canyon are Infeasible.

These two proposed trail locations (identified by "A" label on annotated Figure 27, Attachment 4) are in steep canyon areas with sensitive resources and are completely infeasible and inappropriate for consideration. No additional trails should be proposed anywhere in these two canyon "fingers". The trail designation on Figure 27, "Location to

be determined," suggests that there is a location within these canyon areas that might be suitable, but that is misleading. Figure 7-2 from the UCP Bio Report illustrates the Sensitive Vegetation Communities that exist in this area (Exhibit E), which includes Wetlands, Tier I Native Grasslands, and Tier II Coastal Sage Scrub. The City of San Diego's Land Development Manual – Biology Guidelines states that "Vegetation Communities within the MSCP study area have been divided into four tiers of sensitivity (the first includes the most sensitive, the fourth the least) based on rarity and ecological importance."[1] *See* Land Development Manual at 7. Furthermore, these guidelines note that "lands containing Tier I, II, IIIa and IIIb [communities] and all wetlands . . . are considered sensitive and declining habitats. As such, impacts to these resources may be considered significant." *See* Land Development Manual at 73.

In addition to containing documented sensitive resources, this area consists of steep topography that cannot accommodate public trails. There is also serious erosion occurring in these locations that would only be exacerbated if trails were somehow constructed in this steep terrain. The April 27, 2024 Hamilton letter (Attachment 6) contains photos and descriptions of these two "proposed new trail" areas and a first-hand account of the steepness and inaccessibility of these two canyon fingers. Furthermore, the letter describes sensitive habitat within these areas, leading to the obvious conclusion that trails in these areas are not feasible under the MSCP.

C. The Proposed Formal Trial and Trailhead that Links Rose Canyon to Nobel Drive Traverses Critical Habitat.

This proposed trail location is identified by "B" label on Attachment 5. Under the Federal Endangered Species Act (ESA), the U.S. Fish and Wildlife Service designates certain areas as "critical habitat" if they determine that these geographic areas are essential for the conservation and/or recovery of a federally listed threatened or endangered species, whether or not the species currently occupies the area. The UCP Biological Resources Report notes that "[U]nder the FESA, USFWS designates certain areas as "critical habitat" if they determine that these geographic areas are essential for the conservation and/or recovery of a federally listed threatened or endangered species, whether or not the species currently occupies the area." *See* UCP Bio Report at 91.

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1 https://www.sandiego.gov/sites/default/files/amendment_to_the_land_development_manual_biology_guidelines_february_2018_-_clean.pdf

Figure 8 in the UCP Bio Report identifies locations of USFWS Critical Habitat and demonstrates that the Informal Trail section connecting to Nobel Drive is routed directly through Critical Habitat for Spreading navarretia, a rare species of flowering plant. *See* Attachment 7. The Draft UCP itself shows this area as being along a "MSCP Core Biological Resource Area Corridor" (Figure 29, University Community Open Space). This trail should not only be removed as a proposed formal trail from the UCP exhibits, but it should be eliminated and the area protected from future informal trail establishment. In addition, all other informal trails in this area should be removed from Figure 27 and enforcement should be undertaken to ensure that the trails are marked as closed and signage is installed to keep the public from traversing through this area and further damaging critical habitat.

D. The Proposed Formal Trail on the south side of Rose Canyon from Genesee Avenue east towards I-805 to University Village Park Passes Through Sensitive Habitat.

These proposed trail locations are identified by "C" label on Attachment 4. The Sensitive Vegetation Communities (Figure 7b from the UCP Bio Report, Attachment 8) illustrates that this proposed trail location is in perennial stream/wetland habitat. It also encroaches on private railroad property. If a trail were to avoid the perennial stream and private property, it would be located on steep slopes with high-quality habitat. Only the western third of this trail is potentially feasible and consistent with MSCP policies, given it would be located on the San Diego Unified School District's existing dirt road.

Where the proposed trail turns south and heads towards the proposed tail head, it passes through Tier II Coastal Sage Scrub and Tier IIIA Mixed Chapparal, which are considered sensitive and declining habitats, and into steep topography. The Hamilton letter dated April 27, 2024 further describes that the trail is proposed "through sensitive and minimally disturbed coastal sage scrub, chaparral, and riparian natural communities. The federally threatened Coastal California Gnatcatcher (*Polioptila californica californica*) is known to occur in this area, as well as Nuttall's Scrub Oak (*Quercus dumosa*), a species with a California Rare Plant Ranking (CRPR) of 1B.1, referring to species "threatened, or endangered in California and elsewhere; seriously threatened in California."" As depicted in the photos, there would be no way to establish 1.5 miles of formal trail through this area without incurring large-scale significant impacts to these and other sensitive natural resources in direct violation of MSCP Priority 1 Management Directive No. 2.

The Draft UCP already includes appropriate connectivity infrastructure for this area of the plan with protected bike lanes on Genesee Avenue and Governor Drive. The City

cannot further its connectivity goals with unsafe trails through sensitive habitats in MHPA lands.

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

This proposed trail location is identified by "D" label on Attachment 4. -This area east of Campus Point Drive and northwest of Towne Centre Drive, all of which is in the MHPA (Attachment 9), and furthermore is covered in sensitive habitat (Attachments 7 and 8). The location of the blue "Proposed New Trail", in particular, is *directly* through sensitive habitat. In addition to the trail being proposed in sensitive habitat, due to the City's recent approval of a development project, the trail is no longer practically feasible either. On pages 82 and 83 of the Draft UCP, the map shows the location the proposed trail would connect with Towne Centre Drive, where there would have been a "Transit Plaza." However, in August 2023, the City Council approved the Towne Centre View Project that included the vacation of existing public easements and a public street vacation for the western terminus of Towne Centre Drive, west of Westerra Court. At the time of the approval, the developer stated publicly that they will not allow public access beyond Westerra Court up from the canyon onto their private property. The rest of the properties along Towne Centre Drive are all surrounded by MSCP land, much of it in the Vernal Pool MSCP, so therefore access through those properties is limited as well. The Draft UCP should be updated to reflect this new reality and the proposed trail should be removed.

F. SANDAG's Antiquated Bike Network Trail Should be Removed from the UCP. The City Council specifically removed it from the City's Bicycle Master Plan Update in 2013. It has been superseded by the City's Gilman Dr. Coastal Rail Trail (CRT) project.

UCP Figure 20 (Bicycle Network Map) contains an outdated reference to a previous alignment of the Coastal Rail Trail (CRT). Attachment 10 is Figure 3-3 from SANDAG's 2021 Regional Plan, which incorrectly notes the CRT alignment on the north side of Rose Canyon (Trail ID #11) instead of identifying the "Gilman Connector" (Trail ID #17) as the official CRT alignment. This is an old alignment for the Coastal Rail Trail (CRT) project was proposed by SANDAG over 20 years ago. This alignment was later rejected by the City in 2013 when the City Council voted unanimously to remove the Rose Canyon and Roselle Canyon from the 2012 Bike Master Plan Update. (See Attachment 11, City Council Resolution 308597, approved unanimously, including by then Councilmember and Interim Mayor Todd Gloria).

In 2015, the City chose Gilman Dr as the alignment for the CRT in accordance with the process identified for each city to "plan, design and construct segments of the trail within their respective jurisdictions."[2] The City has since completed final design and environmental review of the CRT project, and has partially funded construction. The Draft UCP correctly shows the Gilman Drive alignment of the Coastal Rail Trail on pages 90-91, so the old SANDAG proposed alignment through Rose Canyon and Roselle Canyon included on Figure 20 should be removed. This is especially important since much of the old Rose Canyon and Roselle Canyon alignment is through MSCP habitat, including critical habitat for Spreading navarretia as shown in the Impacted Listed Plant Species table in the 2021 Regional Plan.

IV. New and Amended Draft Policies

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

A. Proposed New Policies Related to Trails

The following policies should be added to the Draft UCP to make it clear that the City intends to follow its own guidance related to considering new trails:

- "New and formalized trails for passive recreation in Rose Canyon and other MSCP lands will only be considered after sustained habitat conservation and MHPA/MCSP compliance is demonstrated. New trails will be located and designed so as not interfere with the primary purpose of Rose Canyon and other MSCP lands as open space for the preservation of sensitive habitat areas."

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

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

[2] Coastal Rail Trail information on City of San Diego website: https://www.sandiego.gov/cip/projectinfo/featuredprojects/railtrail

Background: The existing trails within Rose Canyon and other MSCP lands experience constant degradation and the construction of new, illegal trails for mountain-biking that are damaging and destroying sensitive resources. The City's Open Space Division is so underfunded, there is very limited monitoring of illegal uses or enforcement within the MHPA boundaries to prevent habitat damage and impacts to wildlife, even as those impacts have greatly increased. The MSCP Subarea Plan states that "[W]here land is preserved as part of the MSCP through acquisition, regulation, mitigation or other means, management is necessary to continue to ensure that the biological values are maintained over time, and that the species and habitats that have been set aside are adequately protected and remain viable. The City will be responsible for and will continue the management and maintenance of its existing public lands (including those with conservation easement), at current levels. The City will also manage and maintain lands obtained as mitigation where those lands have been dedicated to the City in fee title or easement, and land acquired with regional funds within the City's MHPA boundaries." *See* MSCP Subarea Plan at 49. Furthermore, the MCSP Subarea Plan lists the following as one of the General Management Directives: "Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/maintenance as needed." *See* MSCP Subarea Plan at 52. Open space park resources for monitoring and enforcement and habitat protection in Rose Canyon are far below what is needed.

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

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

B. Proposed Revisions to Policies Related to Trails

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

- Policy 2.9C: Developments that are adjacent to MHPA lands or other natural open space must provide signage that informs people of the location of official access points for trails and that clearly prohibits unauthorized access into the adjacent open space. Signs should also provide information about the local native plant and animal species and that San Diego is a biodiversity hot spot. ~~Where possible and permitted by governing codes and regulations, developments that are adjacent to natural open space should provide multi-use trails for hiking, bicycling, jogging, and other uses so that residents can access and appreciate the open space.~~
- Policy 2.9D: Orient the narrow end of buildings toward the open space. ~~Encourage design strategies to maximize views from development to open spaces, such as orienting buildings to open space areas and/or locating common amenity areas adjacent to public open space~~. For MHPA adjacent development, common amenities that involve outdoor lighting and potential noise should ~~consider being~~be located away from the open space or other MHPA edge. Common amenities that involve outdoor lighting and potential noise ~~can also consider being~~shall be located on the other side of buildings to avoid the open space or MHPA edge.
- Policy 2.9E: For buildings that are adjacent to open space and MHPA areas, ~~promote~~ require design strategies that reduce the potential for bird strikes.
- Policy 3.1G: Enhance pedestrian and bicycle access to ~~open space lands, natural recreational areas, and~~ developed parks by improving connectivity and increasing awareness of ~~trails and other~~ pedestrian pathways and on-street bike routes as complementary components of the community's circulation network via signage, wayfinding programs, and educational kiosks. *(Note: Reason for this change: The MSCP does not recognize being part of a circulation network as a purpose for trails – their primary purpose is habitat protection with passive recreation "conditionally compatible".)*
- Policy 3.3A: Provide a continuous bicycle network of safe, convenient, and attractive bikeways on streets and through developed areas throughout the University Community, with an emphasis on low stress connections between the southern neighborhoods and destinations in the northern portion of the

community, as well as to schools, parks, mixed-use and employment villages, commercial centers, transit stations and mobility hubs.

- Policy 3.3C: Support a comprehensive network by implementing bikeways that facilitate interconnectivity with the UC San Diego's bicycle network, the regional bicycle network, and on-street bike routes to ~~trails, and~~ other communities. *(Note: MSCP lands are not part of the regional bicycle network.)*
- Policy 4.1C: Establish an integrated public realm framework of connected sidewalks, urban pathways, ~~trails,~~ paseos, plazas, connections at multimodal mobility hubs, and parks like linear and pocket parks.
- Policy 4.1K: Provide open space linkages in compliance with MHPA goals and policies~~where appropriate~~, including trailheads for bike and pedestrian access with appropriate, visible, and clearly marked entrances and regulations.~~.~~
- Policy 4.1T: Promote a coordinated design theme for the University Community throughout different neighborhoods. For example, create a consistent trailhead marker with similar text, logo and resource materials. MSCP rules and regulations should be included at trailheads into MHPA lands.
- Policy 4.2A: Promote open space conservation of natural lands~~,~~. P~~and p~~rovide open ~~space linkages where appropriate~~, overlooks, trail heads and bike/pedestrian access with appropriate, visible, and clearly-marked entrances where appropriate and in conformance with MCSP and MHPA guidelines.
- Policy 4.2C: Through the Citywide Trails Master Plan process, examine locations where neighborhoods and communities can be connected to adjacent parks and trails (if in conformance with MCSP and MHPA guidelines).~~Connect adjacent communities to trails and trail-adjacent parks by extending existing trails or providing new ones.~~
- ~~Policy 4.2E: Re-vegetate graded slopes adjacent to natural hillsides and canyons with native, drought tolerant, and fire-resistive species to improve drainage conditions, reduce slope erosion and instability, and restore biological diversity.~~ *(Note: Future Natural Resource Management Plan(s) will determine best practices – this language is premature in the UCP.)*
- Policy 5.1A: Promote open space conservation of natural lands and provide open space linkages ~~(where appropriate)~~, trailheads and bike/pedestrian access with clearly marked entrances where appropriate and in conformance with MCSP and MHPA guidelines.

- Policy 5.1B: Connect open space trails with major canyons, neighborhood parks, schools and private open space areas where feasible and where appropriate and in conformance with MCSP and MHPA guidelines. The proposed trail system is illustrated in Figure 27.
- Policy 5.1C: Provide opportunities for public access to open space, including portions of the MHPA, through low impact recreation, scenic overlooks, environmental education and research where appropriate and in conformance with MCSP and MHPA guidelines.
- ~~Policy 5.1E: Connect adjacent communities to trails and trail-adjacent parks by extending existing trails or providing new ones~~ *(Note: Suggest deleting – repetitive and same as Policy 4.2C)*
- Policy 5.2A: ~~Promote~~ Require development patterns that preserve natural landforms, public and private open spaces, wildlife linkages, sensitive species and habitats, watersheds and natural drainage systems, and that contribute to clean air and clean water and help the city meet its climate action and resilience goals.
- Policy 5.2B: ~~Support minimizing~~Minimize the visual, noise, and lighting-related impacts of new development to canyons.
- Policy 5.2C: ~~Minimize and evaluate the use of~~Require that night lighting along the canyons and adjacent to sensitive habitat areas be ~~,~~ consistent with MHPA Adjacency Guidelines, ESL regulations, and Outdoor Lighting regulations. Lights should be full shielded and directed away from the MHPA.
- ~~Policy 5.13I: Consider the topography, vegetation and scenic value of Rose Canyon for future uses. Passive recreational uses are recommended rather than active uses requiring major grading and construction. Protect and restore Rose Canyon Open Space Park for education, research, stewardship, and passive recreation.~~ *(Note: Suggest deleting – adds no value and "for future uses" is confusing.)*
- ~~Policy 5.13J: Pursue an open space easement with access along the north side of the AT & SF Railroad between I-5 and I-805.~~ *(Note: Suggest deleting – most of the land is either railroad right of way or on private property and infeasible.)*

C. Policies Related to Canyon-Adjacent Setbacks and Building Transitions

The Community Discussion Draft of the UCP published in April 2023 contained more appropriate language to guide canyon-adjacent building design. Page 48 in the

Discussion Draft UCP stated: "Development *should* recognize the value of this open space to both support habitat and wildlife and serve as a community resource. This can be accomplished by designing site improvements to minimize development's impact to the open space and to steep hillside areas (see Figure 10). *Buildings adjacent to and facing canyons in the community should step back from the canyon edge with terraces and upper story stepbacks. Wherever possible, the long side of the building should face inward and away from the canyon open space.* Reflective glazing that produces glare and light onto the canyon should be avoided, and *buildings should be articulated* with a pattern of forms and massing that provides a diverse and varied façade along the open space edge. Public access to open space should be maintained with paseos, paths, terraces, and other openings in the development along the canyon edge." (italics added for emphasis). Figure 10 in the Discussion Draft UCP (Canyon-Adjacent Building Design) identifies that buildings should be set back a minimum of 50' from the canyon rim, that the tallest portion of the building should be further from the canyon rim, and that the building should provide upper story setbacks.

However, the Draft UCP backslides and removes all standards, instead providing permissive language in the text and as notes to Figure 11 (Canyon-Adjacent Building Design): Page 56 of the Draft UCP states "*Development is best when* it is designed to recognize the value of open space in supporting habitat and wildlife and serving as a community resource. This *can be accomplished by* designing site improvements to minimize the impact of development to open space and to steep hillside areas. The Community Plan *envisons* development adjacent to and/or face canyon open space areas with buildings that locates the tallest portion of buildings furthest from the canyon rim, incorporates a setback from the canyon edges, and steps back upper story levels as illustrated in Figure 11. Building facades with varied design features *can help to minimize* the potentiate for bird strikes. Outdoor lighting that is shielded, directed downward, and faced away from canyon edges *can help to reduce* reflective glazing that produces glare and light onto the canyon. Development with paseos, paths, terraces along the canyon edge *has the opportunity to* provide public access and views points to open space." (italics added for emphasis). In addition to the shift from prescriptive language to permissive language, reference to building orientation along the canyon rim and having the long side face away from the canyon has been removed. Furthermore, Figure 11 has been amended to remove all "shoulds" and it now the notes simply state observations of the building illustrated, how it is setback from the canyon rim, how the upper story is set back, and how the tallest portion of the building depicted is located furthest away from the canyon rim. The text and Figure 11 do not require anything, they simply acknowledge a number of design elements that could be incorporated.

This is poor policy all around that does not reflect current City policy contained in the supplemental development regulations identified in the Draft UCP (starting on page 187). The setback requirement should be restated and the requirement for a gradual building transition should be reinstated as well. Policies with flexible language such as "encourage", "promote", and "where possible", occasionally have their place, but this is not one. The text on page 56 of the Draft UCP and on Figure 11 should be revised to revert to the text and Figure 10 from the Discussion Draft UCP published in April 2023. Additionally, Figure 35 (Community Plan Implementation Overlay Zone) should be updated to reflect that Canyon-Adjacent Supplement Development Regulations should apply to all properties adjacent to Rose Canyon.

The Discussion Draft included a section of Area-Specific Supplemental Design Regulations that were removed from the Draft UCP and should be added back in:

Canyon-Adjacent Development

> The purpose and intent of these supplemental development regulations are to provide design regulations to lessen the effect of buildings developed adjacent to open space areas designated in this community plan.
>
> SDR-21 Building Design abutting Open Space: Development on sites directly abutting an open space area designated in this community plan shall conform with the following requirements:
>
> a) For a premises greater than 300-feet in depth from the street, provide a 50-foot building setback from the open space area.
>
> b) Provide a 15-foot upper story stepback at least 50 feet above the ground level for the portion of the building fronting the open space area.
>
> c) Orient the short ends of buildings toward the open space areas or break down the length of façades facing the open space areas with articulation in the form of one 4-foot offset in the building plane for every 50 feet of façade length.
>
> d) The use of highly reflective and mirrored glazing is not permitted fronting open space areas.

Furthermore, the policies below should be modified:

- Policy 2.9A: Encourage context-sensitive design by stepping back from the canyon edge and orienting the short end(s) of building(s) perpendicular to the canyon edge. Context-sensitive design shall incorporate the setback, step-back, and building height transition requirements of Canyon-Adjacent Supplement Development Regulations including SDR -C.2 and SDR-21 (or as appropriately renumbered once added back into the Draft UCP).
- Policy 2.9B: ~~Promote design strategies that reduce light and glare on building frontages facing canyons and open space.~~ Design buildings to eliminate light and glare on building frontages facing canyons and open space.
- Policy 2.9E: For buildings that are adjacent to open space and MHPA areas, ~~promote~~ require design strategies that reduce the potential for bird strikes.

V. Urban Design Recommendations to be Removed

Draft UCP Figure 6 includes a combination of design elements for the area. The same faulty trail alignments are proposed in this exhibit, but rebranded as "open space connections" and "Enhanced Multi-Modal Paths." For the same reasons that these cannot be shown as trails on Figure 27 and elsewhere throughout the Draft UCP, they should not be included as "Open Space Connections" and "Enhanced Multi-Modal Paths" in Figure 6. The following urban design elements should be deleted as they do not represent realistic or accurate conditions, including:

- Delete the "Open Space Connection" from the future linear parks at the ends of Regents Road across Rose Canyon. From the exhibit, this appears to suggest that there is a connection from one end of Regents Road to another, which there is not currently and cannot be due to the railroad tracks.
- The path through Rose Canyon west of Genesee should not be shown to cross the RR tracks near I-5. It is illegal to cross the tracks.
- Delete the "Open Space Connection" east of Genesee on the south side of the railroad tracks. This proposed route is in the MHPA, would be either in the creek bed and/or in the railroad right of way. In order to stay out of the creek bed and railroad right of way, it would need to be built on steep slopes in the MSCP, including some highly sensitive habitat.
- Delete the "Open Space Connection" east of Genesee and north of the railroad tracks that connect up Nobel Hill to the Nobel Dr/Judicial Drive intersection. That

trail alignment on Nobel Hill is shown elsewhere in the Draft Plan Update to be closed. This trail is also largely in the MSCP.

- Delete the "Enhanced Multi-Modal Path" west of Genesee and north of the railroad tracks. A portion of it is in MSCP, and much of the rest is on private property. An "Enhanced Multi-Modal Path" is not an allowable use in the MSCP.

- Delete the "Enhanced Multi-Modal Path" east of Genesee on the north side of the railroad tracks and up Nobel Hill to the Nobel Dr. intersection. Again, most of that is in the MSCP, and an Enhanced Multi-modal path is not an allowed use in the MHPA.

- Delete the "Enhanced Multi-Modal Path" in Roselle Canyon from Eastgate Mall to Roselle Street. Much of that is in the MSCP.

VI. There Are Zoning and Graphic Inconsistencies On Properties in the UCP Area That Should be Remedied

The zoning districts for the following properties in the UCP boundary should be corrected to accurately reflect the actual uses and land use designations as well as to protect open space MSCP lands in the UCP area. Through implementation of the adopted University Community Plan, the zoning corrections should be made as follows:

Towne Centre Drive – Roselle Canyon – Sorrento Headlands area.

The zoning at the north end of Towne Centre Drive should be updated to reflect existing conservation agreements and conditions on the city owned MSCP lands in this area. This parcel is incorrectly shown in the IP 1-1 (Prime Industrial) zone. Zoning should be corrected from IP1-1 to OP 2-1 or OC 1-1 on the 5-acre, city owned conservation/MSCP parcel (APN: 343-121-38), which is situated just north of Towne Centre Drive. This parcel was specifically deeded to the city in 1998 with a conservation deed "to be preserved as permanent open space in the city's MHPA" (see R-290280, 6/16/98, p 4) as part of the approval of the Eastgate Acres project. It has been 100% conserved in the MHPA since 1998, and its zoning should reflect this status.

"Pueblo Lands Central and South"), managed by the Public Utilities Department.

The current zoning for these lands today is RS 1-14, which is not accurate, but which has helped to maintain them in undeveloped open space. The Draft UCP proposes to zone these two parcels IL-2-1 (Light industrial). The proposed zoning for these parcels should

be OC 1-1, OP 2-1, or AR in recognition of their critical environmental status. Pueblo Lands "central" (north of Nobel Dr) and "south" (south of Nobel Dr) comprise 71 acres of environmentally sensitive, city-owned land between I-805 and sensitive habitat areas in MCAS Miramar. They include two city-owned parcels in mixed conservation status managed by the Public Utilities Department. The largest part of these parcels in the MCAS Airport Transition Zone, which limits development potential due to crash safety potential. The Pueblo Lands Central parcel (north of Nobel) is shown in Data Basin as 100% conserved MHPA land. IL 2-1 Zoning for Pueblo lands central (north of Nobel Dr), in particular, is not consistent with this MSCP status. The Pueblo Lands South parcel (south of Nobel Drive) is also being used for habitat mitigation and grassland restoration in mitigation for the PURE Water project. The parcels comprise critical links in the MSCP identified wildlife corridor connecting habitat cores in Rose Canyon OS Park, MCAS-Miramar, and Mission Trails Regional Park with lands connected to the Penasquitos watershed.- Open Space zoning for the parcels would be consistent with the proposed Land Use Designations for these parcels, shown on page 33 of the Draft UCP, and consistent with UCP Policy 5.13G: "Retain the areas influenced by MCAS Miramar activities as open space per the existing fee ownership of the Federal Government in the interest of public health, safety and welfare."

Need to correct the location of MSCP Core Biological Resource Area Corridor.

Figure 29 incorrectly identifies the MSCP Core Biological Resource Area Corridor running north/south on the wrong side of I-805. It should be on the east side of I-805, where there is open space (the west side is developed). This is important – especially in combination with rezoning the "Pueblo lands Central and South" east of I-805 that comprise this wildlife corridor to Open Space.

VII. Conclusion.

This is a pivotal point in the planning process, and we urge the City to produce a Final UCP that complies with the City's MSCP obligations. New trails in Rose Canyon and other MHPA lands should follow the appropriate process of assessment *before* identification, as required and as promised by City staff. Implementation of proper canyon-adjacent development standards will prevent undesirable impacts to canyon habitat and species, and should be addressed properly in the UCP.

We look forward to reviewing the Final UCP and its accompanying Final PEIR to ensure that the changes described herein on the Draft UCP, and in this firm's comment letter on the Draft PEIR, have been addressed.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Kristi Bascom

Kristi T. Bascom, AICP

cc: Deborah Knight, Executive Director, Friends of Rose Canyon (via email)
Heather M. Minner, Partner, Shute, Mihaly, & Weinberger, LLP

Attachments:

1. SMW letter to Heidi Vonblum, dated August 12, 2022
2. SMW letter to City of San Diego re Community Discussion Draft UCP, dated June 30, 2023
3. Friends of Rose Canyon memo dated April 29, 2024 Re: List of edits required to remove proposed trails from MSCP habitat
4. Annotated Draft UCP Figure 27
5. Biological comments prepared by Robert Hamilton, President of Hamilton Biological, Inc. dated June 29, 2023
6. Biological comments prepared by Robert Hamilton, President of Hamilton Biological, Inc. dated April 27, 2024
7. UCP Biological Resources Report Figure 8 – Critical Habitat
8. UCP Biological Resources Report Figures 7a and 7b – Sensitive Vegetation Communities
9. UCP Biological Resources Report Figure 4 – MHPA Lands
10. SANDAG 2021 Regional Plan Figure 3-3 – Regional Bicycle Network
11. City Council Resolution 308597

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Attachment 1

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August 12, 2022

Via Electronic Mail Only

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

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

Dear Ms. Vonblum:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

> **PP10:** To ensure the City adheres to its conservation commitments, all proposals for new or revised access, trails, and active uses in resource/open space parklands must

comply with all applicable limitations, such as the MSCP consistency findings, Environmentally Sensitive Land regulations, Natural Resource Management Plans, etc. before being formally proposed for City evaluation and funding (see policies CSR25 and RP5).

CSR 25: Develop, adopt, and update a Citywide Trails Master Plan to guide the provision and enhancement of open space multi-purpose trails that accommodate pedestrians, hikers, bicyclists, mountain bikers, and equestrians, where appropriate, and to provide safe and convenient linkages to parks, recreation facilities, and open space areas consistent with policies PP10, CO3, CO10, CSR16, and CSR22. A Trails Master Plan shall include a set of criteria and guidelines for evaluating and establishing thresholds of access and use for Open Space parks that prioritize habitat management planning and other requirements in ESL policy and MSCP obligations in advance of specific trails planning. These criteria and guidelines will reflect and encompass the current science of recreation ecology.

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

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

* * * *

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

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

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Heather M. Minner

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

1529175.5

Attachment 2

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June 30, 2023

Via Electronic Mail Only

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

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

Dear UCP Project Manager:

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

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

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

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

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

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

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

The Parks Master Plan requires the City to take additional steps before any new trail locations can be proposed for sensitive areas, including Rose Canyon. Specifically, the City must first engage in the planning process committed to for a Citywide Trails Master Plan. Policy CSR 25 from the Parks Master Plan states that the City shall: "Develop, adopt, and update a Citywide Trails Master Plan to guide the provision and enhancement

of open space multi-purpose trails that accommodate pedestrians, hikers, bicyclists, mountain bikers, and equestrians, where appropriate, and to provide safe and convenient linkages to parks, recreation facilities, and open space areas consistent with policies PP10, CO3, CO10, CSR16, and CSR22. A Trails Master Plan shall include a set of criteria and guidelines for evaluating and establishing thresholds of access and use for Open Space parks that prioritize habitat management planning and other requirements in ESL policy and MSCP obligations in advance of specific trails planning. These criteria and guidelines will reflect and encompass the current science of recreation ecology." (underline added)

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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1 https://www.sandiego.gov/sites/default/files/amendment_to_the_land_development_manual_biology_guidelines_february_2018_-_clean.pdf

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

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

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

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

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

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

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

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

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

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

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

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

IV. New and Amended Draft Policies

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

Suggested new policies:

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

[2] Coastal Rail Trail information on City of San Diego website: https://www.sandiego.gov/cip/projectinfo/featuredprojects/railtrail

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

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

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

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

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

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

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

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

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

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

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

VI. Conclusion.

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

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

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Heather M. Minner

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

Exhibits:

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

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EXHIBIT A

SHUTE, MIHALY & WEINBERGER LLP

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August 12, 2022

Via Electronic Mail Only

Heidi Vonblum
Planning Director
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San Diego, CA 92123
E-Mail: VonblumH@sandiego.gov

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

Dear Ms. Vonblum:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

> **PP10:** To ensure the City adheres to its conservation commitments, all proposals for new or revised access, trails, and active uses in resource/open space parklands must

comply with all applicable limitations, such as the MSCP consistency findings, Environmentally Sensitive Land regulations, Natural Resource Management Plans, etc. before being formally proposed for City evaluation and funding (see policies CSR25 and RP5).

CSR 25: Develop, adopt, and update a Citywide Trails Master Plan to guide the provision and enhancement of open space multi-purpose trails that accommodate pedestrians, hikers, bicyclists, mountain bikers, and equestrians, where appropriate, and to provide safe and convenient linkages to parks, recreation facilities, and open space areas consistent with policies PP10, CO3, CO10, CSR16, and CSR22. A Trails Master Plan shall include a set of criteria and guidelines for evaluating and establishing thresholds of access and use for Open Space parks that prioritize habitat management planning and other requirements in ESL policy and MSCP obligations in advance of specific trails planning. These criteria and guidelines will reflect and encompass the current science of recreation ecology.

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

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

* * * *

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

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

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Heather M. Minner

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

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EXHIBIT B

HAMILTON BIOLOGICAL

June 29, 2023

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

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

Dear UCP Project Manager,

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

OVERVIEW OF MSCP AND MHPA

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

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

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

Subarea Plan Section 1.5.2, General Management Directives

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

Priority 1 Directives for Public Access, Trails, and Recreation

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

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

3. In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off trail access and use. Provide trail repair/maintenance as needed. Undertake measures to counter the effects of trail erosion, including the use of stone or wood cross joints, edge plantings of native grasses, and mulching of the trail.

4. Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than four (4) feet in core areas or wildlife corridors. Exceptions are in the San Pasqual Valley, where other agreements have been made; in Mission Trails Regional Park, where appropriate; and in other areas where necessary to safely accommodate multiple uses or disabled access. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.

5. Limit the extent and location of equestrian trails to the less sensitive areas of the MHPA. Locate staging areas for equestrian uses at a sufficient distance (e.g., 300 to 500 feet) from areas with riparian and coastal sage scrub habitats to ensure that the biological values are not impaired.

6. Off-road or cross-country vehicle activity is an incompatible use in the MHPA, except when these vehicles are used for law enforcement, preserve management, or emergency purposes. Restore disturbed areas to native habitat where possible or critical, or allow to regenerate.

7. Limit recreational uses to passive uses such as birdwatching, photography, and trail use. Locate developed picnic areas near MHPA edges or specific areas within the MHPA to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (e.g., opossums, raccoons, skunks). Where permitted, restrain pets on leashes.

8. Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.

9. Maintain equestrian trails on a regular basis to remove manure (and other pet feces) from the trails and preserve system in order to control cowbird invasion and predation. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g., grass-lined) swale or basin to detain runoff and remove pollutants.

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

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

Overall Management Policies and Directives for Urban Habitat Lands

1. Where the MHPA's Urban Habitat Lands are part of a natural resource park, the City Park and Recreation Department shall manage these lands in accordance with a Natural Resource Management Plan (NRMP). The NRMPs for Urban Habitat Lands include the Marian Bear Memorial Park NRMP, Mission Bay Park NRMP, First San Diego River Improvement Project, and Los Peñasquitos Canyon Preserve NRMP.

2. All other Urban Habitat Lands included within the MHPA should be managed, to the extent possible, according to the general management policies and directives as described in the City Subarea Plan and summarized above.

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

UCP Purpose and Context is Incomplete and Flawed for Failing to Incorporate the Subarea Plan's Management Policies and Directives

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

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

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

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

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

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

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

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

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

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

Vision and Land Use Framework Ignores MSCP Requirements

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

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

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

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

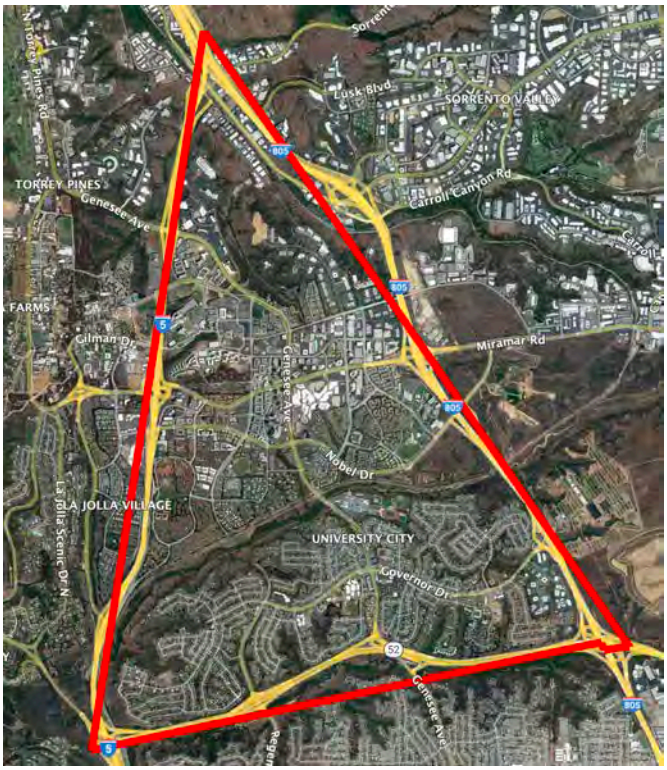

Exhibit A. For simplicity, this exhibit focuses on the southern part of the UCP planning area—the triangle formed by Interstate 5, Interstate 805, and State Route 52. No ecologist, or other conservation-minded person, looking at this landscape would conclude that building new trails in the few preserved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

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

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

"Nature Based Park" vs. Generic "Open Space"

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

Urban Forestry

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

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

[1] https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/Landscape/WELDManual-Appendix-J.pdf

OPEN SPACE AND CONSERVATION

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

TABLE 6: UCP PLAN POLICIES

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

REVIEW OF BIOLOGICAL RESOURCES REPORT (BUSBY 2020)

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

Busby Report is Out of Date

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

Busby Report Contains No Analyses

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

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

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

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

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

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

Busby Report's Sensitive Species Information is Incomplete

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

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

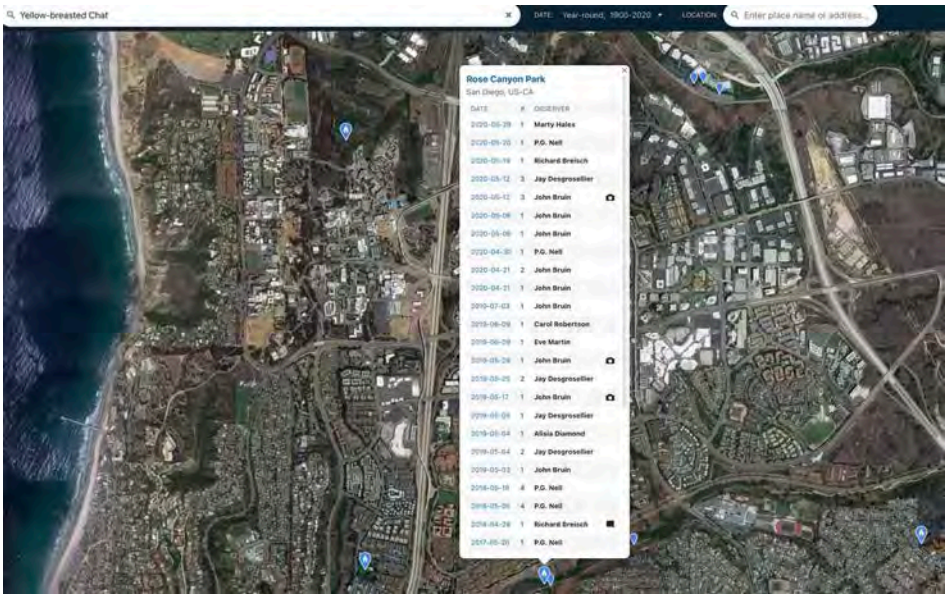

Exhibit B. Screen grab from eBird showing a partial list of numerous records of the Yellow-breasted Chat at Rose Canyon Open Space Park from 2017 to 2020, some documented with photographs. The species has also been recorded at several other locations within the UCP planning area.

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

No Maps of Special-Status Species or Wildlife Use Areas

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

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

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

Fragmentation and Edge Effects

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Recreation and Trail Effects

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

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

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

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

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

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

EVALUATION OF TWO PROPOSED NEW TRAILS IN UCP

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

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

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

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

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

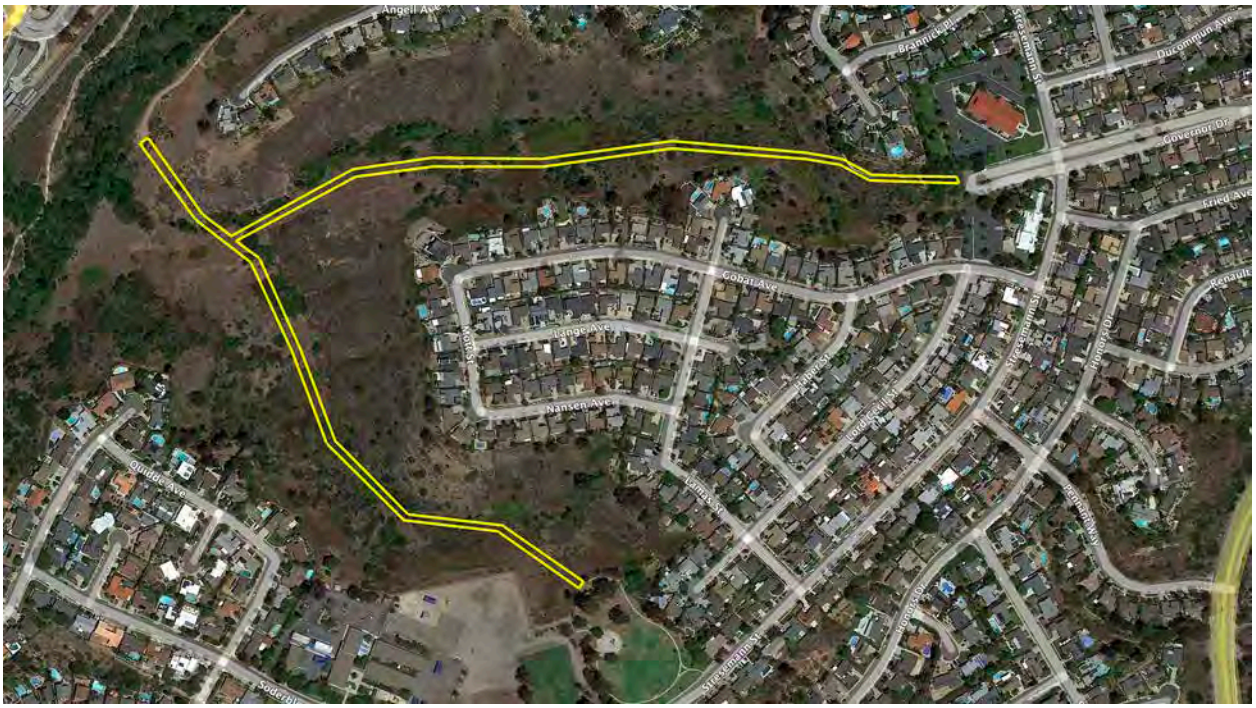

Exhibit C. Showing the conceptual, or schematic, alignments for approximately one mile of new trails that the UCP proposes to connect from Governor Drive (northern trail) and Stresemann Street (southern trail) to the southern end of the existing Rose Canyon Trail. Contrary to MSCP planning principles,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

All Proposed Trails Must Be Evaluated for MSCP Consistency

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

Conclusion

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

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

Sincerely,

Robert A. Hamilton
President, Hamilton Biological, Inc.

cc: David Zoutendyk, USFWS
Jonathan Snyder, USFWS
Scott Sobiech, USFWS
David Mayer, CDFW
Susan Wynn, CDFW
Karen Drewe, CDFW
Dan Silver, Endangered Habitats League

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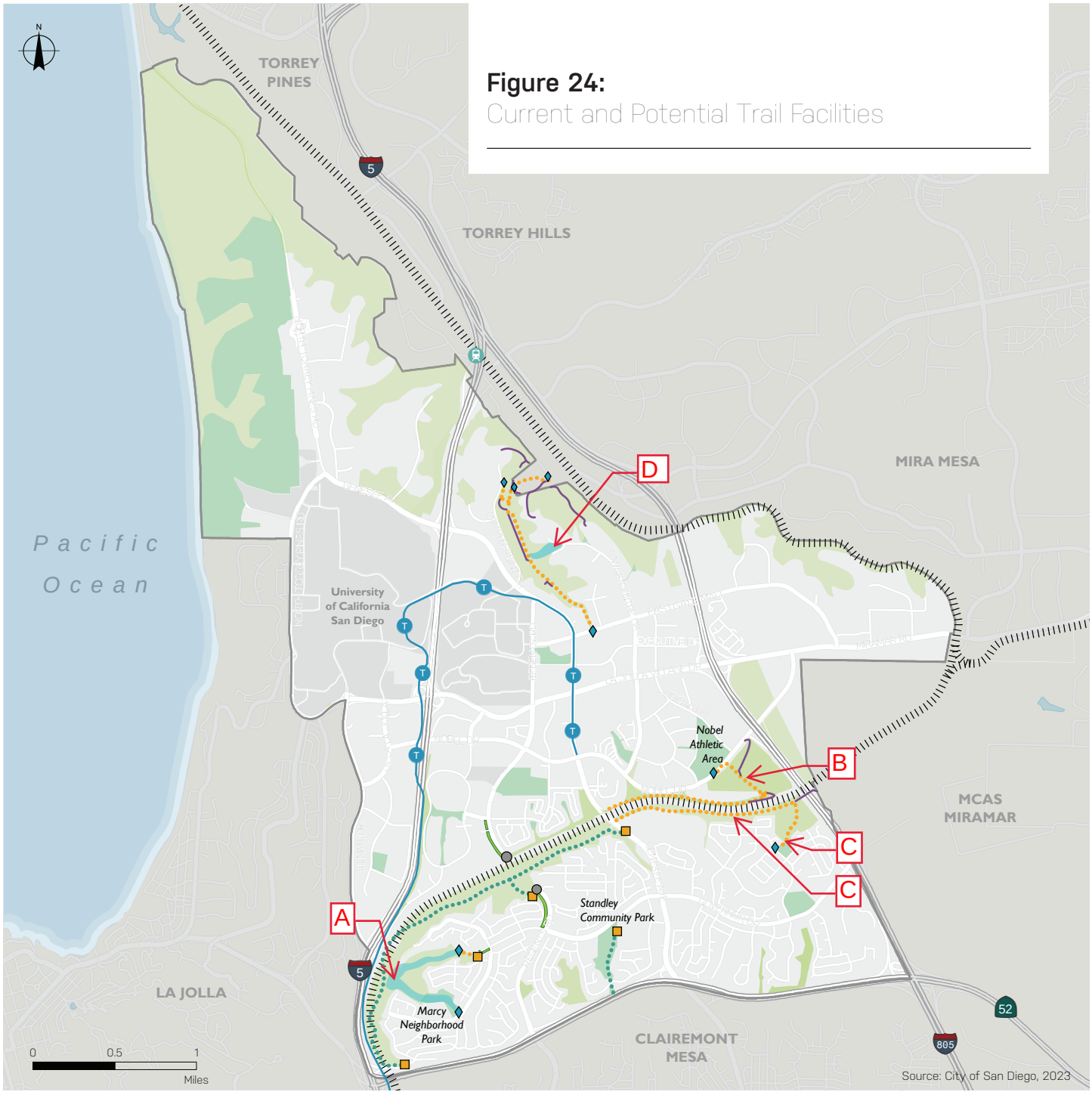
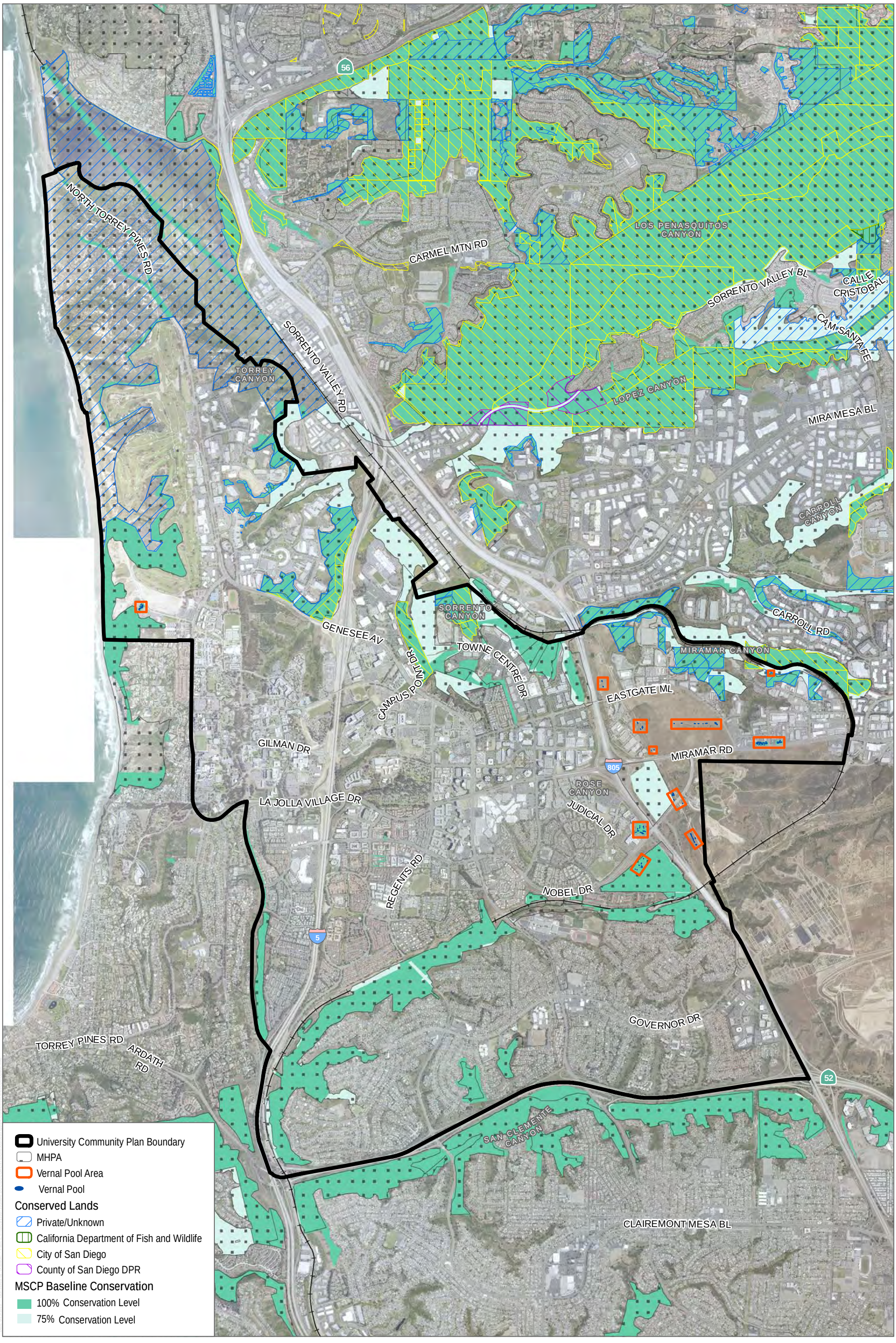
EXHIBIT C

Figure 24:
Current and Potential Trail Facilities



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

EXHIBIT D



SOURCE: SANGIS 2017, 2019; USFWS 2020

DUDEK

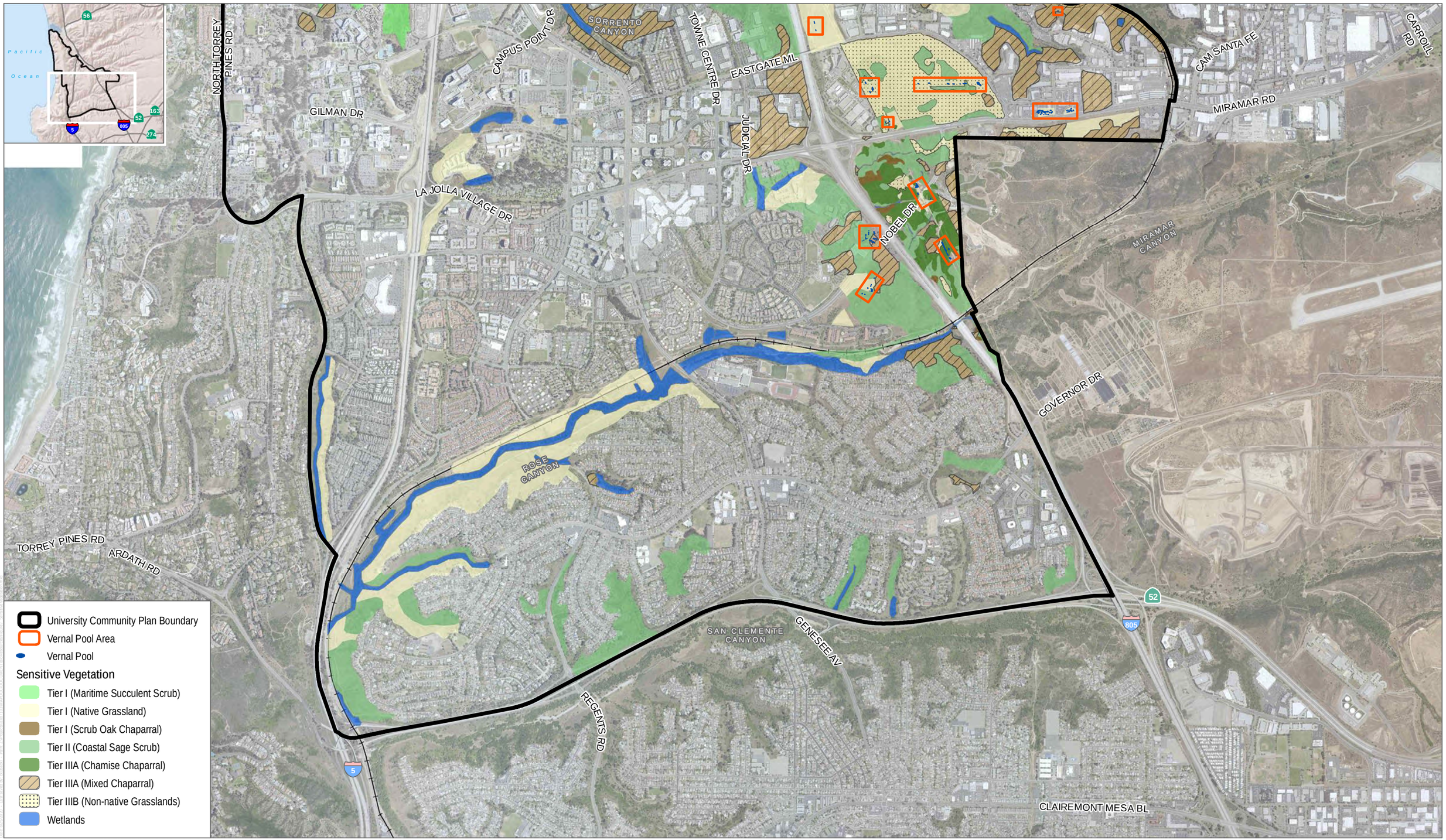
0 1,400 2,800 Feet

FIGURE 4

Conserved Lands and Open Space

University Community Plan Update

EXHIBIT E



SOURCE: SANGIS 2017

DUDEK

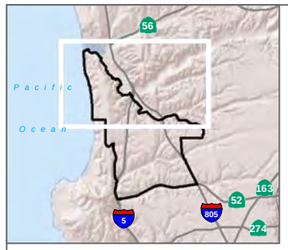
0 1,000 2,000 Feet

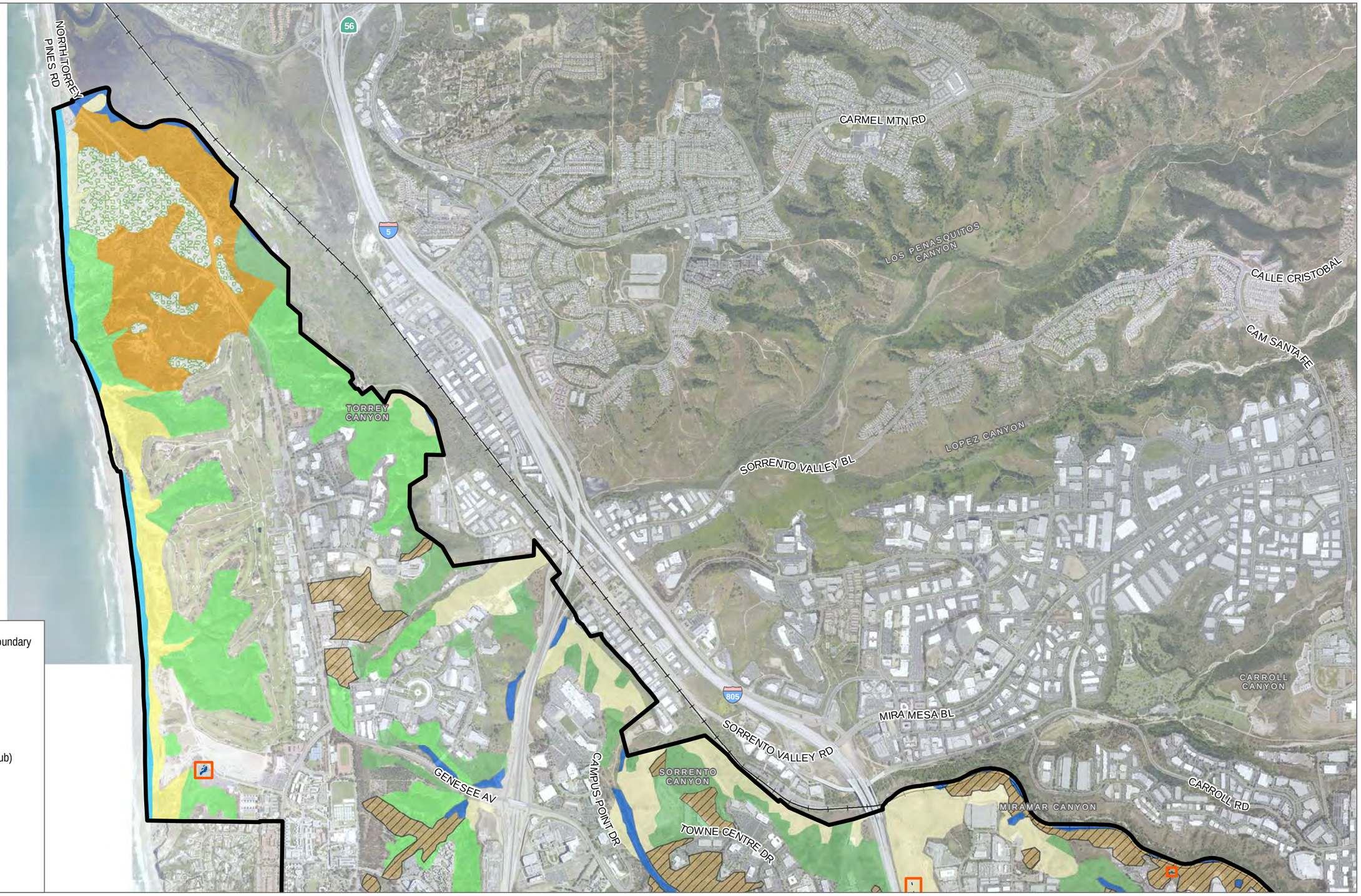
FIGURE 7-2

Sensitive Vegetation Communities

University Community Plan Update

EXHIBIT F





SOURCE: SANGIS 2017

DUDEK

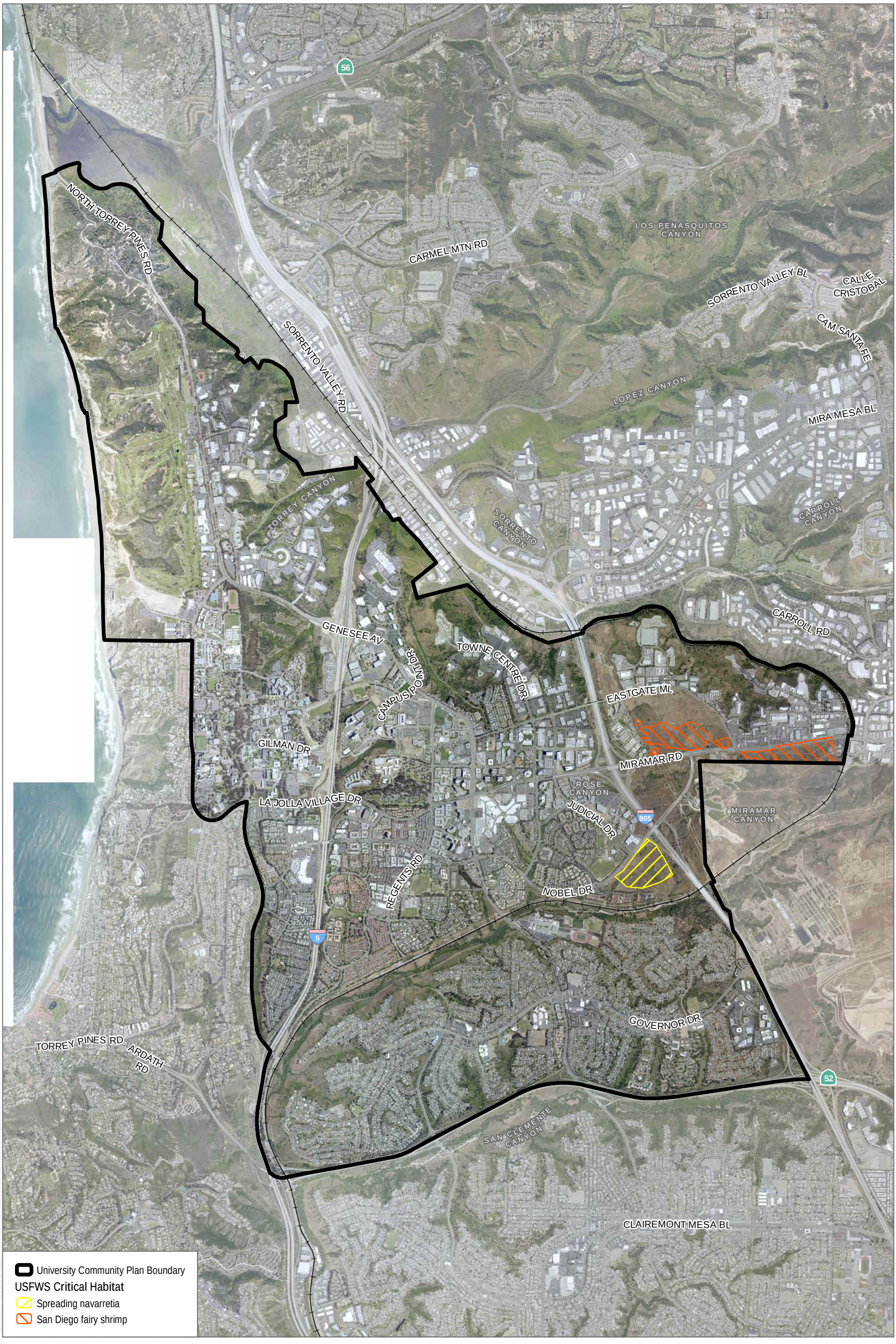
0 1,000 2,000 Feet

FIGURE 7-1

Sensitive Vegetation Communities

University Community Plan Update

EXHIBIT G



SOURCE: SANGIS 2017, 2019; USFWS 2020

DUDEK

0 1,400 2,800 Feet

FIGURE 8

USFWS Critical Habitat

University Community Plan Update

EXHIBIT H

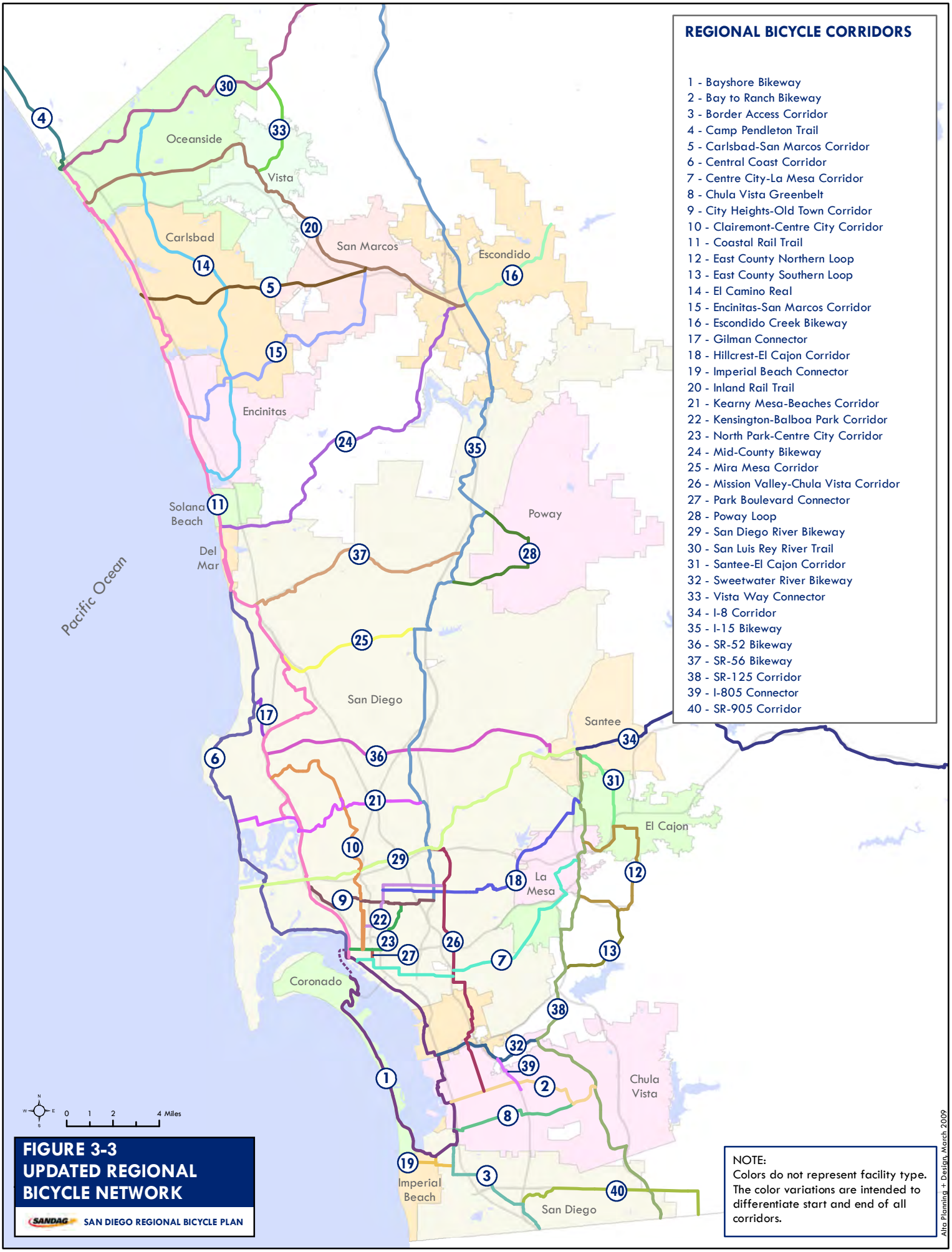


FIGURE 3-3
UPDATED REGIONAL BICYCLE NETWORK

SANDAG SAN DIEGO REGIONAL BICYCLE PLAN

EXHIBIT I

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

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

[1] Species potential impact based on known locations existing data sources (e.g., CNDDB, SANDAG) and presence of suitable habitat. Listed species not shown are not anticipated to be impacted.
[2] Transportation network improvements not listed are not anticipated to impact listed plant species.

Attachment 3

Friends of Rose Canyon Comment on March 2024 Draft University Community Plan
Re: List of edits required to remove proposed trails from MSCP habitat
April 29, 2024

The following is a list of the Pages/Maps in the March 2024 Draft University Community Plan that show proposed/existing informal trails in MSCP habitat. Some of the proposed trails have additional problems: they are partially in the Railroad ROW, which is illegal, or on private property. These pages/maps need to be edited to reflect the removal of these proposed trails. This list should assist in making the changes.

P. 50
Delete all "open space connections" through Rose Canyon (the heavy green lines), except for the City's recognized trail on the south side of the RR tracks going west from Genesee Ave.
(Note: the proposed trail across Rose Canyon shown connecting the two linear parks on Regents Road is not only in the MSCP, it would cross the RR tracks, which is illegal.)

Delete all "Enhanced Multi-Modal Paths" in Rose Canyon. They are in the MHPA. Delete the "Enhanced Multi-Modal Path" on the north side of the RR tracks going west from Genesee: that is in the MSCP for a distance and otherwise on private property.

Delete the "Enhance Multi-Modal Path" in Roselle Canyon from Eastgate Mall to Roselle St. That is partially in the MHPA.

P. 82- 83
Delete the dotted black lines that go from Eastgate Mall to Roselle Street, and from the bottom of the canyon up to Towne Centre Drive and up to Campus Point Drive. Much of this is in the MSCP.

P. 84-85
Public Realm: Delete the orange square at the north end of Towne Ctr Drive – that is now private property. The City approved the Towne Center View Project in 2023 that included a street vacation and conversion to private property for Biomed Realty for everything beyond Westerra Court.
Placemaking: Delete the green dotted lines in the canyon between Eastgate Mall and Campus Pointe Drive and from the canyon up to Towne Ctr Drive: that is largely in the MSCP, and that end of Towne Centre Drive (past Westerra Court) is now private property.
Connectivity: Delete the dotted lines in the canyon extending from Eastgate Mall to Roselle Street with branches up to Towne Ctr Drive and Campus Point. Much of that is in the MHPA.

P. 86-87
Delete all the "Potential Trail Opportunities" except for the existing trail that goes from Genesee Avenue west through Rose Canyon. They are all partially or fully in the MSCP.

P. 88-89
Public realm: Delete all the trails in Rose Canyon except the existing recognized trail from Genesee Avenue going west. They are all partially or fully in the MHPA.
Placemaking: Delete all the trails in Rose Canyon except the existing recognized trail from Genesee Avenue going west. Delete the trail in the canyon going north from Eastgate Mall. They are all

partially or fully in the MHPA. It's unclear why there is a large orange area on the property of University City High School.
Connectivity: Delete all the trails in Rose Canyon except the existing recognized trail from Genesee Avenue going west. Delete the trail in the canyon going north from Eastgate Mall. They are all partially or fully in the MHPA. Delete the large pink Micro Mobility Hub in Rose Canyon near the end of Regents Road north of the railroad tracks.

P. 90-91
Delete the proposed trail on the north side of the RR tracks from I-5 to La Jolla Colony Drive. That is in the RR ROW, which is illegal.
Delete the proposed trail north of the RR tracks from La Jolla Colony Drive to Regents Road. That is on private property.
Delete the proposed trail from the west end of Rose Canyon going up the finger canyon (toward Governor Drive, which is not shown). That is MHPA.

P. 92-93
Public Realm
Delete the proposed trail on the north side of the RR tracks from I-5 to La Jolla Colony Drive. That is in the RR ROW, which is illegal.
Delete the proposed trail north of the RR tracks from La Jolla Colony Drive to Regents Road. That is on private property.
Delete the proposed trail from the west end of Rose Canyon going up the finger canyon (toward Governor Drive, which is not shown). That is MHPA.

Placemaking
Delete the proposed trail from the west end of Governor Dr. (starting with "Health Loop") through Rose Canyon. That is MHPA.

Connectivity
Delete the proposed trail from the west end of Governor Dr. (starting with "Health Loop") through Rose Canyon. That is MHPA.
Delete the proposed trail on the north side of the RR tracks from I-5 to La Jolla Colony Drive. That is in the RR ROW, which is illegal.
Delete the proposed trail north of the RR tracks from La Jolla Colony Drive to Regents Road. That is on private property.

P. 94-95
Delete: Potential trails in Rose Canyon from the west end of Governor and from Marcy Park. Those are in MHPA and extremely steep slopes.
Delete the proposed trail on the north side of the RR tracks from I-5 to La Jolla Colony Drive. That is in the RR ROW, which is illegal.
Delete the proposed trail north of the RR tracks from La Jolla Colony Drive to Regents Road. That is on private property.
Delete: All "potential trails" east of Genesee Ave.

P. 96-97
Public Realm and Placemaking AND Connectivity maps

Delete potential trails from west end of Governor and Marcy Park in Rose Canyon
Delete all "Community Loop" trails in Rose Canyon east of Genesee Avenue (both north and south of the RR tracks)
Delete: North of the tracks, remove trail from I-5 to La Jolla Colony Drive (mostly in the RR ROW, which is illegal) and between La Jolla Colony Drive and Regents Road (on private property).

P. 98-99
Delete proposed trails in Rose Canyon (south of Nobel Drive)

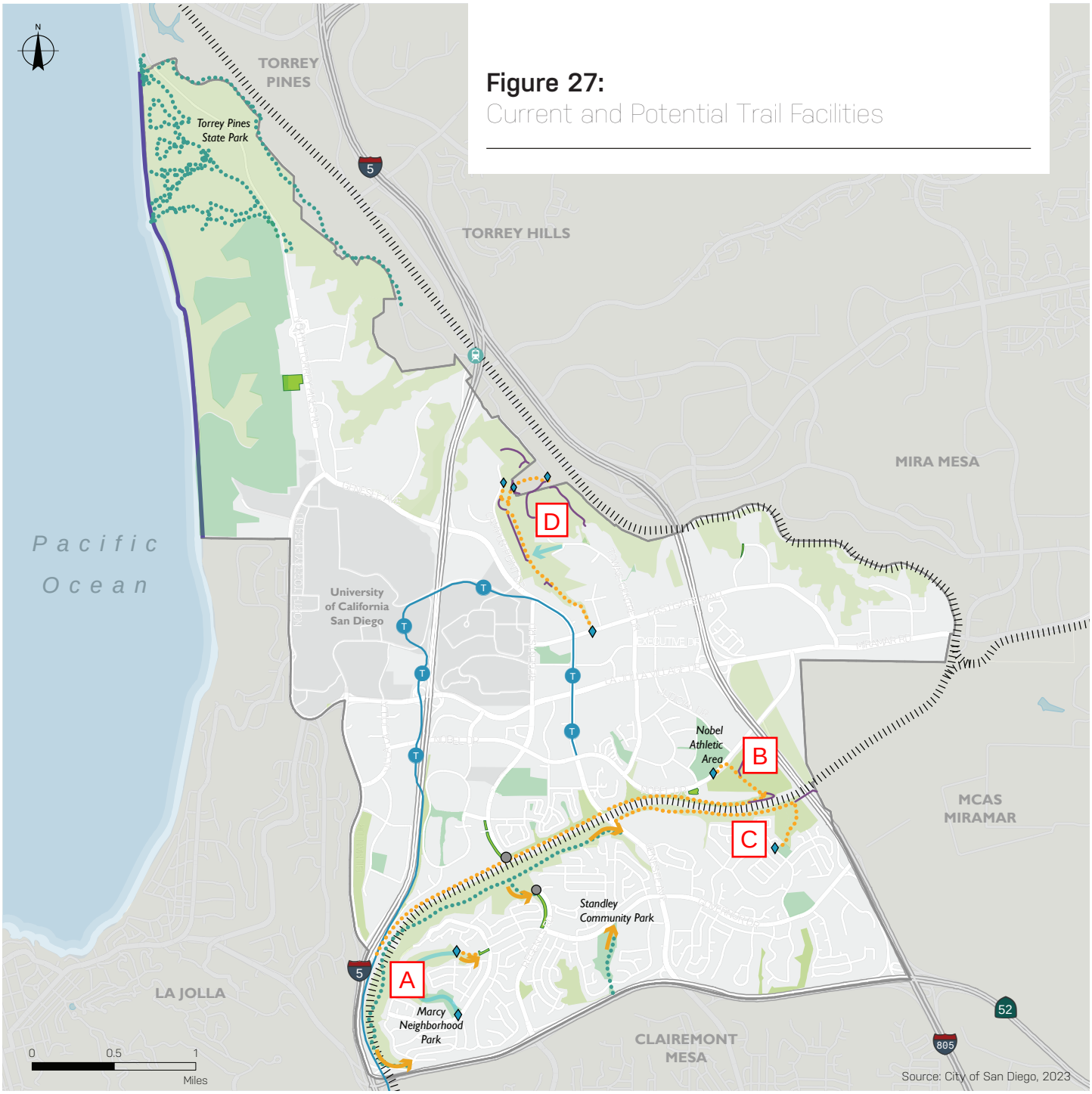
P. 100 -101
Public Realm and Placemaking AND Connections maps:
Delete proposed trails in Rose Canyon

P. 110
Delete: Purple line depicting SANDAG 2021 Regional Bike Adopted Bike Network
This is a very old proposed alignment for the Coastal Rail Trail (CRT) which was unanimously removed from consideration by the City Council when it updated the City's Bike Master Plan in 2013. They City has since chosen a different CRT alignment (based on extensive public input) that goes up Gilman Drive. The City has since completed final design, environmental, and put millions of dollars toward final construction of that CRT alignment. The old alignment still shows up in the SANDAG Bike Network because that document has not been updated in over 10 years.

P. 131
Figure 27
Delete all trails in Rose Canyon except the existing "Formal Trail" from Genesee to Bothe St (near SR-52) and the trail from the end of Regents on the south side of the canyon. They are all fully or partially in the MHPA.
Delete the trail from Eastgate Mall to Roselle Street and the branches off it up to Towne Centre Dr. and Campus Pt. Drive. Much of this is in the MHPA.
Delete the "existing informal" trail west of Genesee Avenue on the north side of the RR tracks. A portion of the distance is in the MHPA, and most of the rest is on private property.

Attachment 4

Figure 27:
Current and Potential Trail Facilities



- Possible Overlook
- Possible Trailhead
- Existing Trailhead
- Future Parks and Recreational Amenities
- Existing Informal Trail - To Be Closed
- Proposed New Trail (location to be determined)
- Existing Informal, Proposed as a Formal Trail
- Existing Formal Trail
- Publicly Accessible Shoreline

Attachment 5

HAMILTON BIOLOGICAL

June 29, 2023

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

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

Dear UCP Project Manager,

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

OVERVIEW OF MSCP AND MHPA

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

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

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

Subarea Plan Section 1.5.2, General Management Directives

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

Priority 1 Directives for Public Access, Trails, and Recreation

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

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

3. In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off trail access and use. Provide trail repair/maintenance as needed. Undertake measures to counter the effects of trail erosion, including the use of stone or wood cross joints, edge plantings of native grasses, and mulching of the trail.

4. Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than four (4) feet in core areas or wildlife corridors. Exceptions are in the San Pasqual Valley, where other agreements have been made; in Mission Trails Regional Park, where appropriate; and in other areas where necessary to safely accommodate multiple uses or disabled access. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.

5. Limit the extent and location of equestrian trails to the less sensitive areas of the MHPA. Locate staging areas for equestrian uses at a sufficient distance (e.g., 300 to 500 feet) from areas with riparian and coastal sage scrub habitats to ensure that the biological values are not impaired.

6. Off-road or cross-country vehicle activity is an incompatible use in the MHPA, except when these vehicles are used for law enforcement, preserve management, or emergency purposes. Restore disturbed areas to native habitat where possible or critical, or allow to regenerate.

7. Limit recreational uses to passive uses such as birdwatching, photography, and trail use. Locate developed picnic areas near MHPA edges or specific areas within the MHPA to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (e.g., opossums, raccoons, skunks). Where permitted, restrain pets on leashes.

8. Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.

9. Maintain equestrian trails on a regular basis to remove manure (and other pet feces) from the trails and preserve system in order to control cowbird invasion and predation. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g., grass-lined) swale or basin to detain runoff and remove pollutants.

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

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

Overall Management Policies and Directives for Urban Habitat Lands

1. Where the MHPA's Urban Habitat Lands are part of a natural resource park, the City Park and Recreation Department shall manage these lands in accordance with a Natural Resource Management Plan (NRMP). The NRMPs for Urban Habitat Lands include the Marian Bear Memorial Park NRMP, Mission Bay Park NRMP, First San Diego River Improvement Project, and Los Peñasquitos Canyon Preserve NRMP.

2. All other Urban Habitat Lands included within the MHPA should be managed, to the extent possible, according to the general management policies and directives as described in the City Subarea Plan and summarized above.

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

UCP Purpose and Context is Incomplete and Flawed for Failing to Incorporate the Subarea Plan's Management Policies and Directives

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

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

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

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

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

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

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

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

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

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

Vision and Land Use Framework Ignores MSCP Requirements

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

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

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

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

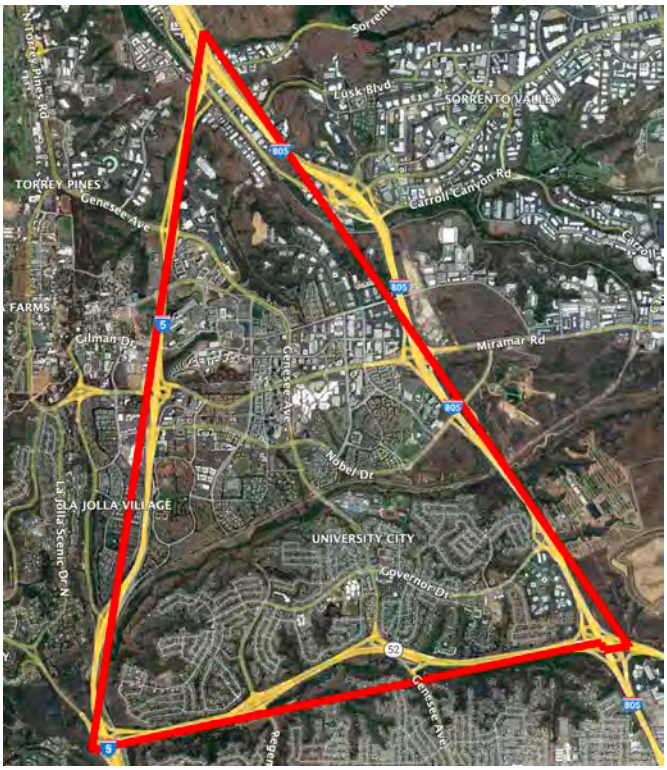


Exhibit A. For simplicity, this exhibit focuses on the southern part of the UCP planning area—the triangle formed by Interstate 5, Interstate 805, and State Route 52. No ecologist, or other conservation-minded person, looking at this landscape would conclude that building new trails in the few preserved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

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

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

"Nature Based Park" vs. Generic "Open Space"

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

Urban Forestry

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

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

[1] https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/Landscape/WELDManual-Appendix-J.pdf

OPEN SPACE AND CONSERVATION

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

TABLE 6: UCP PLAN POLICIES

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

REVIEW OF BIOLOGICAL RESOURCES REPORT (BUSBY 2020)

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

Busby Report is Out of Date

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

Busby Report Contains No Analyses

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

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

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

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

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

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

Busby Report's Sensitive Species Information is Incomplete

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

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

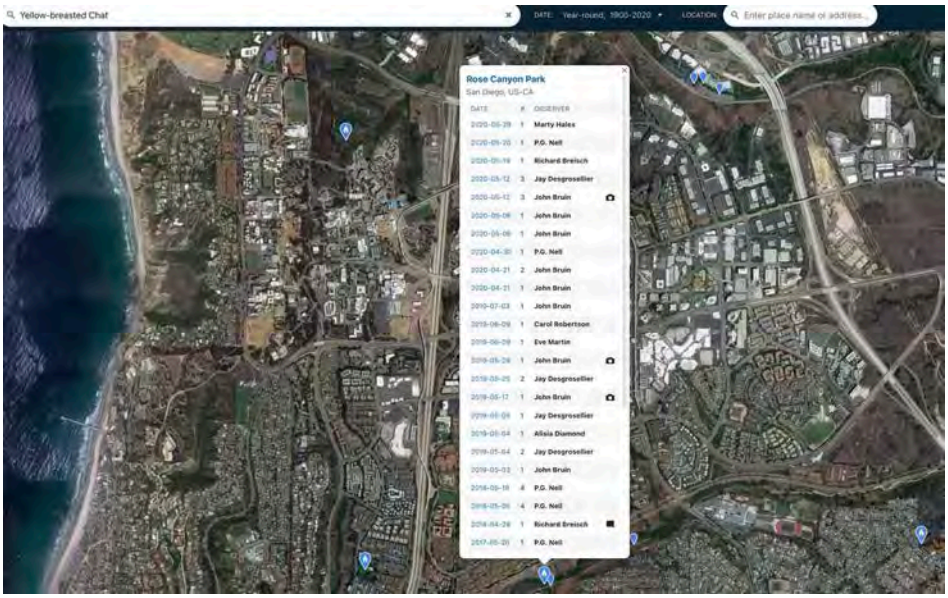


Exhibit B. Screen grab from eBird showing a partial list of numerous records of the Yellow-breasted Chat at Rose Canyon Open Space Park from 2017 to 2020, some documented with photographs. The species has also been recorded at several other locations within the UCP planning area.

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

No Maps of Special-Status Species or Wildlife Use Areas

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

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

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

Fragmentation and Edge Effects

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Recreation and Trail Effects

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

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

Greer et al. (2017) evaluated different approaches to resolving problems associated with creation, use, and maintenance of unpermitted trails at the Del Mar Mesa Preserve, activities that had fragmented and degraded the Preserve's natural communities for at least a decade at that time. They concluded, in part:

> This Study showed that soft enforcement aimed at public education and redirecting social norms was not sufficient in curbing illegal trail use in an urban natural area. The movement towards citations and the threat of citations was effective at redirecting behavior by making

> non-compliance more risky. This in turn had an unintended consequence of promoting hostility amongst a large user base.

The long-standing resource management problems associated with illegal trails at the Del Mar Mesa Preserve persist, with no clear resolution in sight (e.g., Karen Billing, San Diego Union Tribune, July 6, 2022: *Del Mar Mesa Preserve Tunnel Trail Vandalized* https://www.sandiegouniontribune.com/local/story/2022-07-06/del-mar-mesa-preserve-trail-vandalized).

EVALUATION OF TWO PROPOSED NEW TRAILS IN UCP

All trails, including those that are carefully sited and well-designed, necessarily contribute to habitat fragmentation, edge effects, and recreation impacts. To minimize these insidious forms of habitat degradation, Section 1.5.2 of the Subarea Plan identifies several Priority 1 Directives for Public Access, Trails, and Recreation. As discussed previously in this letter, the most important of these for the UCP project is No. 2:

> Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary because of the typically heightened resource sensitivity in those locations.

I have not yet visited the specific areas that would be impacted by proposed new trails, but examination of aerial imagery and Figure 7-2 in the Busby Report (Sensitive Vegetation Communities) demonstrate to me that construction of at least two of the proposed new trails—from Governor Drive and from Stresemann Street to the bottom of Rose Canyon—would be grossly inconsistent with the MSCP's conservation goals. These two trails would be built through sensitive wetlands, native grasslands, and coastal sage scrub in two major side-canyons to Rose Canyon that lack substantial trails in the existing condition (see Exhibit C on the next page). According to Debby Knight (in litt.):

> The canyons there are incredibly steep and are crisscrossed by huge, deep erosion gullies caused by storm drain pipes that empty out from the streets along the edges of development. This causes wide erosion gullies that are 8-10′ deep and simply uncrossable. These crisscrossing the whole area. Topo maps should show how steep the terrain is in areas. A few of us tried to walk these two trails several years ago. We tried to walk from the west end of Governor down, and found it nearly impossible to walk due to how steep the slope is, and the fact that we had to repeatedly climb down into deep erosion gullies and back up again. We made it only a small distance of the way in over an hour. We tried to walk from the bottom up of the proposed trail alignment from Stresemann St., and that was also literally impossible to walk - a giant erosion gully about 8′ deep and 10′ across, and then slopes so steep we could barely keep our footing. We stopped less than half way up.

Because of their prohibitive topography, the sensitive natural communities, and lack of substantial trails, these two side-canyons to Rose Canyon currently provide habitat for those wildlife species that are most sensitive to habitat fragmentation, human presence (hiking, cycling), and presence of dogs. Constructing new trails through these important areas of refuge would be completely antithetical to MSCP conservation goals.

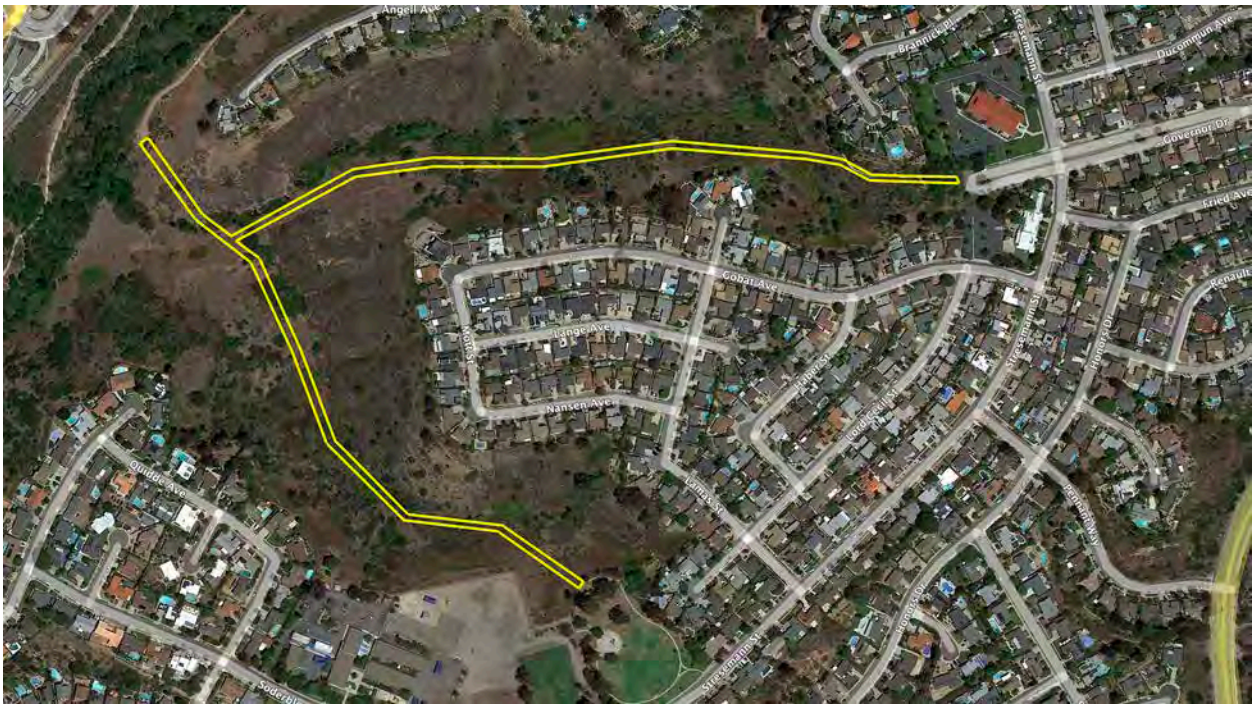


Exhibit C. Showing the conceptual, or schematic, alignments for approximately one mile of new trails that the UCP proposes to connect from Governor Drive (northern trail) and Stresemann Street (southern trail) to the southern end of the existing Rose Canyon Trail. Contrary to MSCP planning principles, these trails would be built through steep terrain vegetated with sensitive plant communities (wetlands, native grassland, coastal sage scrub) in canyons that currently lack substantial trails. Such areas are especially valuable for wildlife that is sensitive to habitat fragmentation, human presence (hiking, cycling), and interactions with dogs.

All Proposed Trails Must Be Evaluated for MSCP Consistency

The two trails discussed previously and shown in Exhibit C present the most obvious conflicts with the MSCP and the MHPA. Given the hard line reserve status of the urban reserve lands in the MHPA, it is unlikely that any new trails, apart from trails proposed entirely on existing dirt roads, could be legitimately determined to be consistent with MSCP requirements. The City must conduct a thorough and credible evaluation for MSCP consistency before proposing any new trails in the MHPA.

Conclusion

As discussed herein, the City's exclusion of the relevant MSCP Management Policies and Directives from the UCP violates the Parks Master Plan, undermines the UCP's credibility as a planning document, and puts the City's MSCP Take Authorization at risk of revocation by the resource agencies. Furthermore, by prematurely proposing new trails in the absence of a current biological technical report that credibly demonstrates the UCP's consistency with the MSCP and Subarea Plan, the City is improperly raising expectations among the public that these trails can and will be built. The predictable result is unwarranted conflict between environmental and recreational user groups. For these important reasons, the City should withdraw all proposed trails through the MHPA until a credible analysis of MSCP consistency can be completed.

If any recipient has questions, please send e-mail to robb@hamiltonbiological.com or call me at (562) 477-2181.

Sincerely,

Robert A. Hamilton
President, Hamilton Biological, Inc.

cc: David Zoutendyk, USFWS
Jonathan Snyder, USFWS
Scott Sobiech, USFWS
David Mayer, CDFW
Susan Wynn, CDFW
Karen Drewe, CDFW
Dan Silver, Endangered Habitats League

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Attachment 6

HAMILTON BIOLOGICAL

April 27, 2024

City of San Diego Planning Department
9485 Aero Drive, M.S. 413
San Diego, CA 92123
E-Mail: planningceqa@sandiego.gov

SUBJECT: COMMENTS ON BIOLOGICAL RESOURCE ISSUES: DRAFT PROGRAM EIR FOR BLUEPRINT SD INITIATIVE, HILLCREST FOCUSED PLAN AMENDMENT TO THE UPTOWN COMMUNITY PLAN, AND UNIVERSITY COMMUNITY PLAN AND LOCAL COASTAL PROGRAM UPDATE

Dear City of San Diego Planning Department,

Friends of Rose Canyon is a community organization concerned with the protection of sensitive natural resources in Rose Canyon Open Space Park, and other sensitive habitat areas within the UCP planning area, consistent with existing regulations. At the request of Friends of Rose Canyon, Hamilton Biological has reviewed the Draft Program EIR for the *Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update* (hereafter the "DPEIR"). Hamilton Biological's review includes the *Biological Resources Report, University Community Plan Update, City of San Diego, San Diego County, California*, dated March 2024, prepared for the City of San Diego (the City) by Busby Biological Services, Inc. (Busby [2024] or the Busby Report).

OVERVIEW OF MSCP AND MHPA

The San Diego Multiple Species Conservation Program (MSCP) Subarea Plan (City of San Diego 1997) was prepared pursuant to an outline developed by the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) — collectively referred to as the "wildlife agencies" — to satisfy the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. The Subarea Plan forms the basis for the Implementing Agreement, which is the contract between the City and the wildlife agencies that ensures implementation of the Subarea Plan and thereby allows the City to issue take permits at the local level. The Subarea Plan also qualifies as a stand-alone document to implement the City's portion of the MSCP preserve.

The City of San Diego Multi-Habitat Planning Area (MHPA) was developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA delineates core biological resource areas and corridors targeted for conservation. The MHPA represents a "hard line" preserve, in which boundaries have been specifically determined. It is considered an urban preserve which is constrained by existing or approved development, and is comprised of linkages connecting several large areas of habitat.

PROPOSED ACTIONS CONFLICT WITH MSCP PRIORITY 1 MANAGEMENT DIRECTIVE NO. 2 AND WOULD HAVE SIGNIFICANT ADVERSE EFFECTS ON SENSITIVE BIOLOGICAL RESOURCES

The MSCP Subarea Plan commits the City to following several specific management directives. As acknowledged on page 4.10-44 of the DPEIR:

> Those actions identified as Priority 1 are **required to be implemented** by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. [emphasis added in bold]

Priority 1 Management Directive No. 2 requires the City to "Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA." In violation of this MSCP requirement, the Figure 3-26 in DPEIR (Figure 27 in the Draft University Community Plan Update, hereinafter referred to as "the Project") proposes the establishment of several new formal trails through extremely sensitive habitat areas. On April 16, 2024, I visited the project area to see and photograph several areas of sensitive MHPA proposed for trail impacts in the University Community Plan area and covered under the DPEIR.

University Village Park to Genesee Avenue

The DPEIR (Figure 3-26) proposes to establish approximately 1.5 miles of formal trail from University Village Park north and west through existing MHPA conserved lands in the Rose Canyon watershed. The area proposed for establishing the new, formal trail is now served by a narrow, informal trail that passes through sensitive and minimally disturbed coastal sage scrub, chaparral, and riparian natural communities. During my site visit on April 16, 2024, I observed a pair of the federally threatened Coastal California Gnatcatcher (*Polioptila californica californica*) in this area, as well as extensive stands of Nuttall's Scrub Oak (*Quercus dumosa*), a species with a California Rare Plant Ranking (CRPR) of 1B.1, referring to species "threatened, or endangered in California and elsewhere; seriously threatened in California." As shown in the following Exhibit 1 and Photos 1–11, there would be no way to establish 1.5 miles of formal trail through this area without incurring large-scale significant impacts to these and other sensitive natural resources in direct violation of MSCP Priority 1 Management Directive No. 2.

Exhibit 1. Showing the locations of 11 photos depicting current habitat and trail conditions in the Rose Canyon watershed, University Village Park to Genesee Avenue. The image is oriented with North at the left margin, South at the right margin, East at the top margin, and West at the bottom. All photos by Robert Hamilton, April 16, 2024.

Photo 1. View to southwest showing the existing narrow, informal trail through sensitive coastal sage scrub habitat. I observed a pair of California Gnat-catchers here at the time of this photo.

Photo 2. View to southwest showing a narrow, informal trail through sensitive coastal sage scrub habitat, next to a seasonal drainage.

Photo 3. View to north showing narrow, informal trail through sensitive coastal sage scrub and chaparral habitat.

Photo 4. Blossoms of checkerbloom (*Sidalcea malviflora*), a native perennial herb typically found in minimally disturbed riparian habitats.

Photo 5. Underside of the leaf of Nuttall's Scrub Oak, a species considered "threatened, or endangered in CA and elsewhere; seriously threatened in California." This species grows in dense stands in the areas shown from Photo 5 through Photo 11. Any trail "improvements" through this area, as proposed in the DPEIR, would necessarily impact large numbers of this highly sensitive plant species.

Photo 6. Photo, facing north, showing narrow, informal trail through sensitive coastal sage scrub and Nuttall's Scrub Oak habitat.

Photo 7. A large, healthy specimen of Chalk Dudleya (*Dudleya pulverulenta*) growing with Sticky Monkeyflower (*Diplacus puniceus*), further evidence of intact, minimally disturbed habitat along the existing informal trail.

Photo 8. View to the north showing the narrow, informal trail passing through sensitive Nuttall's Scrub Oak and riparian habitat.

Photo 9. Dense stand of Nuttall's Scrub Oak immediately south of the existing informal trail that runs along and through the bottom of Rose Canyon.

Photo 10. View to the east showing how the existing informal trail runs straight into the streambed in the bottom of Rose Canyon. Any effort to establish a formal trail here would require impacting the streambed and/or adjacent sensitive habitats (see Photos 9, 11).

Photo 11. View to the east showing that the existing informal trail disappears into the streambed in the bottom of Rose Canyon. Any effort to establish a formal trail here would require impacting the streambed and/or adjacent sensitive habitats.

The DPEIR fails to disclose the general magnitude of impacts proposed to special-status species, such as the California Gnatcatcher and Nuttall's Scrub Oak, that are known or likely to occur in the proposed trail impact area.

The DPEIR also fails to describe a credible and feasible mitigation approach that would reduce impacts to special-status species and natural communities to less than significant.

In the DPEIR's impact analysis, Issue 5, Conservation Planning, asks:

> Would the project conflict with the provisions of the MSCP, VPHCP, other an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, such as introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects or introduce invasive species of plants into a natural open space area?

In response, the DPEIR asserts on page 4.3-60: "The Blueprint SD Initiative, Hillcrest FPA, and University CPU do not propose policies that would conflict with the MSCP." The proposed establishment of 1.5 miles of formal trail through the sensitive habitats shown in Photos 1–11 would conflict with Priority 1 Management Directive No. 2 of the MSCP Subarea Plan, which requires trails to be located "in the least sensitive areas of the MHPA." Because the MSCP Subarea Plan requires the City to implement all Priority 1 directives as a condition of the MSCP Take Authorization, the proposed formal trail between University Village Park and Genesee Avenue, and the other proposed trials discussed in this report, must be removed from the DPEIR. Failure to remove the trails will cause the Project to conflict with the MSCP, and will result in significant impacts to multiple special-status species and sensitive/protected natural communities.

Page 4.3-61 of the DPEIR promises, "Future site-specific developments are required to demonstrate compliance with the City's MSCP thereby ensuring potential impacts associated with conflicts with the MSCP would be less than significant." The City's assurances of future compliance lack credibility. For reasons discussed herein, constructing *any* formal trail through this area would violate the Subarea Plan's most important Priority 1 Management Directive, thus negating any potential to demonstrate compliance with the MSCP.

Furthermore, as reported on page 109 of Appendix D to the DPEIR, the MSCP Subarea Plan requires: "Where the MHPA's Urban Habitat Lands are part of a natural resource park, the City Park and Recreation Department shall manage these lands in accordance with a Natural Resource Management Plan (NRMP)." Yet, for 27 years, the City has managed the Rose Canyon Open Space Park without benefit of an NRMP.

Agency-approved NRMPs must be prepared for Rose Canyon, Nobel Hill, and all of the City's other natural resource parks, and all trails proposed in sensitive habitat areas must be removed from the project. Until both of these MSCP requirements have been satisfied, the City has no basis for assuring the public that all proposed project actions will comply with the MSCP and other applicable conservation plans.

Nobel Hill

This area supports the federally threatened California Gnatcatcher (I observed a pair there during my site visit on April 16, 2024) and 38 acres of vernal pools designated as Critical Habitat for the federally threatened Spreading Navarretia (*Navarretia fossalis*). The DPEIR (Figure 3-26) proposes to convert approximately 0.3 mile of existing informal trail through this sensitive habitat area into formal trail, and to eliminate one informal trail. Exhibit 2 and Photos 12–14 show existing conditions in this area. Because the proposed trail would be located through sensitive habitat areas, it would conflict with the MSCP.

Exhibit 2. Showing the locations of three photos depicting current habitat and trail conditions in the Nobel Hill area. Note the extensive network of illegal trails. All photos by Robert Hamilton, April 16, 2024.

Photo 12. View to the northwest showing the existing informal trail up Nobel Hill that would be converted to a formal trail. The adjacent habitat is coastal sage scrub.

Photo 13. View to north showing the existing informal trail through sensitive coastal sage scrub and chamise chaparral habitats. I observed a pair of California Gnatcatchers in this patch of chamise at the time of this photo.

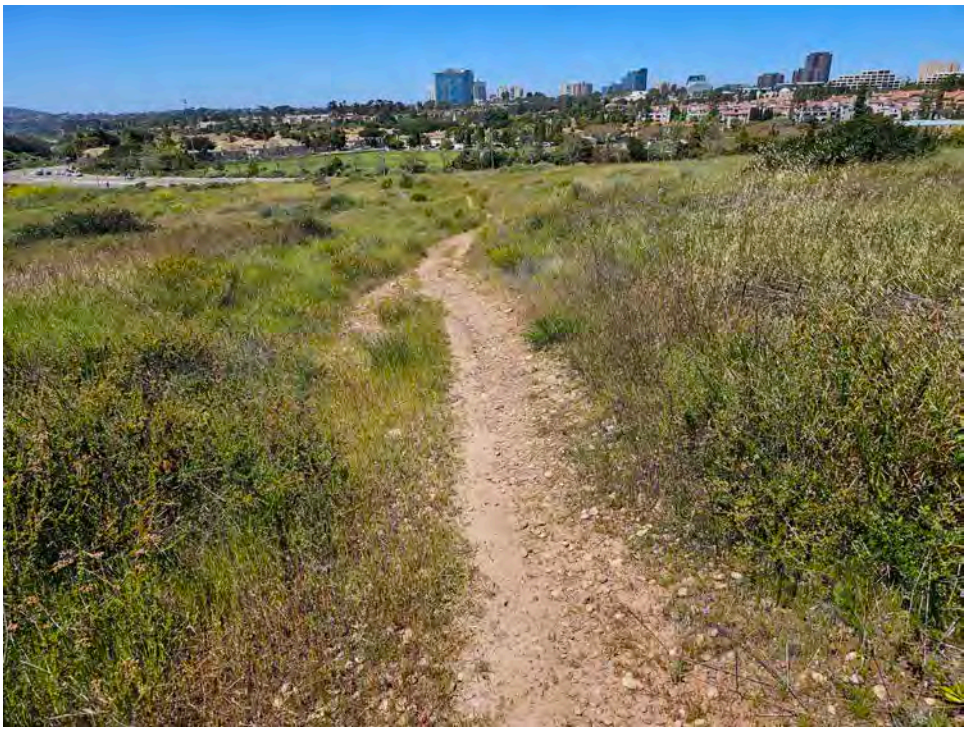

Photo 14. View to northwest showing the existing informal trail through sensitive grass/scrub habitat.

As discussed on page 9 of this letter, the MSCP is predicated upon the City managing important urban habitat areas, such as Nobel Hill, under Natural Resource Management Plans that the City is required to prepare. In the absence of the required plans, and enforcement efforts, we see the unchecked creation of more and more illegal trails through sensitive MHPA — sensitive lands putatively conserved under the MSCP. The Nobel Hill conservation area is crisscrossed by numerous illegal trails that seriously degrade and fragment the sensitive resources in this important area (see Exhibit 2 on page 10 of this letter). The City has taken no meaningful actions to reduce or otherwise mitigate these threats to the sensitive resource in this natural area. The Project, however, proposes to close only one of these illegal trails. Allowing these informal trials to remain is having substantial adverse effects on special status species that will increase over time.

Failure of the DPEIR to designate all illegal trails for closure also conflicts with the MSCP Priority 1 Policy #1, which requires barriers and signage to direct public access away from sensitive areas.

The DPEIR's proposed establishment of a formal trail through the Nobel Hill conservation area would only increase human traffic into this sensitive, unmanaged area. This would predictably lead to the creation of even more unauthorized trails through the habitat, with potentially significant adverse effects upon the California Gnatcatcher, Spreading Navarretia, San Diego Fairy Shrimp (*Branchinecta sandiegonensis*), Orcutt's Brodiaea (*Brodiaea orcuttii*), and numerous other special-status plant and wildlife species found on Nobel Hill.

Proposed New Trails to Lower Rose Canyon Trail

The DPEIR identifies completely new trails, one from the southern terminus of Governor Drive and the other from Marcy Neighborhood Park, that would connect to the lower end of the Rose Canyon Trail in the Rose Canyon Open Space Park. As shown in Exhibit 3 and Photos 15–20, both trail alignments would pass through sensitive wetlands, native grasslands, and coastal sage scrub, incurring massive and significant impacts to these and other sensitive natural resources. This would be a significant biological impact under all five significance thresholds identified in the DPEIR. It is also a significant biological impact because it is in direct violation of MSCP Priority 1 Management Directive No. 2.

Exhibit 3. Showing in red the two proposed trail alignments, one from the end of Governor Drive (Photos 15–17) and the other from Marcy Neighborhood Park (Photos 18–20). All photos by Robert Hamilton, April 16, 2024.

Photo 15. View to southeast showing sensitive coastal sage scrub habitat where the DPEIR proposes a new trail from Governor Drive to the lower Rose Canyon Trail.

Photo 16. View to southwest showing sensitive coastal sage scrub and riparian habitat where the DPEIR proposes a new trail from Governor Drive to the lower Rose Canyon Trail.

Photo 17. View to west showing sensitive coastal sage scrub and riparian habitat where the DPEIR proposes a new trail from Governor Drive to the lower Rose Canyon Trail.

Photo 18. View to northeast showing sensitive coastal sage scrub, riparian, and grassland habitat where the DPEIR proposes a new trail from Marcy Neighborhood Park to the lower Rose Canyon Trail.

Photo 19. View to northwest showing sensitive coastal sage scrub, riparian, and grassland habitat where the DPEIR proposes a new trail from Marcy Neighborhood Park to the lower Rose Canyon Trail.

Photo 20. View to northwest showing sensitive coastal sage scrub and riparian habitat where the DPEIR proposes a new trail from Marcy Neighborhood Park to the lower Rose Canyon Trail.

As described by a local resident, Deborah Knight (in litt.):

> The canyons there are incredibly steep and are crisscrossed by huge, deep erosion gullies caused by storm drain pipes that empty out from the streets along the edges of development. This causes wide erosion gullies that are 8-10′ deep and simply uncrossable. These crisscross the whole area. Topo maps should show how steep the terrain is in areas. A few of us tried to walk these two trails several years ago. We tried to walk from the west end of Governor down, and found it nearly impossible to walk due to how steep the slope is, and the fact that we had to repeatedly climb down into deep erosion gullies and back up again. We made it only a small distance of the way in over an hour. We tried to walk from the bottom up of the proposed trail alignment from Stresemann St., and that was also literally impossible to walk - a giant erosion gully about 8′ deep and 10′ across, and then slopes so steep we could barely keep our footing. We stopped less than half way up.

Due to their prohibitive topography, sensitive natural communities, and lack of substantial trails, these two side-canyons to Rose Canyon currently provide habitat for those wildlife species that are most sensitive to habitat fragmentation, human presence (hiking, cycling), and presence of dogs. Constructing new trails through these important areas of refuge would not only directly contradict Priority 1 Management Directive No. 2 of the MSCP Subarea Plan, which requires trails to be located "in the least sensitive areas of the MHPA," but such an undertaking would be antithetical to the MSCP's most basic conservation goals. By identifying these potential new trail alignments in the DPEIR, the City demonstrates a lack of understanding about the MSCP, MHPA, and the City's conservation responsibilities under the MSCP.

If these proposed new trails remain in the proposed Project, they will have substantial adverse effect upon sensitive riparian, coastal sage scrub, and grassland habitats, federally protected wetlands, and wildlife nursery sites. The edge effects and habitat fragmentation effects associated with these new trails would be massive. The DPEIR should disclose and evaluate all of these significant impacts in detail.

Proposed New Trail Between Campus Point Drive and Towne Centre Drive

The DPEIR (Figure 3-26) identifies another new trail through sensitive coastal sage scrub habitat east of Campus Point Drive and northwest of Towne Centre Drive, all of which is designated as MHPA. This would cause significant impacts to sensitive coastal sage scrub habitat and associated special-status species, such as the California Gnatcatcher, and it would violate Priority 1 Management Directive No. 2 of the MSCP Subarea Plan, which requires trails to be located "in the least sensitive areas of the MHPA."

DPEIR Provides Inadequate and Erroneous Information on Locations of Special-Status Plant and Wildlife Species

The DPEIR provides inadequate, and in some cases erroneous, information on the locations where special-status plant and wildlife species are known or likely to occur within the project area. Page 4.3-23 states:

> The Biological Resources Report completed for the University CPU (Appendix D) identified 47 sensitive plant species either known to occur or with a potential to occur within the University CPU area. Refer to Table 4 of Appendix D for additional information regarding the sensitive plant species that occur or have a potential to occur within the University CPU area.

Page 4.3-27 states:

> The Biological Resources Report completed for the University CPU (see Appendix D) identified 37 sensitive wildlife species either known to occur or with a potential to occur within the University CPU area. Refer to Table 6 of Appendix D for sensitive species with a potential to occur within the University CPU area.

Referring to Appendix D, the reader finds Table 4, "Sensitive Plant Species with a Potential to Occur in the UCPA" and Table 6, "Sensitive Wildlife Species with a Potential to Occur in the UCPA." These tables provide only vague information on the locations where various special-status species are known or expected to occur within the University CPU planning area. For example, the status of Nuttall's Scrub Oak, a highly sensitive species with an important population in Rose Canyon, is given as follows:

> **Present.** Known from many historical locations scattered throughout the UCPA and 1-mile buffer (Alden 2023; Calflora 2023; CDFW 2023a; HELIX 2022; RECON 2023; SDNHM 2023). May occur in other suitable habitat within the UCPA.

As documented in this letter, the DPEIR's proposal to establish approximately 1.5 miles of formal trail from University Village Park north and west through existing MHPA conserved lands in the Rose Canyon watershed would unavoidably impact dense, intact stands of Nuttall's Scrub Oak. Readers of the DPEIR are not given any useful information on the known distribution of Nuttall's Scrub Oak within the DPEIR planning area, on the locations of the most important stands of this rare plant, or on the general magnitude of impacts to this species anticipated from creating the proposed formal trail through Rose Canyon. **In fact, the DPEIR gives no indication that the proposed trail would impact Nuttall's Scrub Oak at all.** The same is true for all sensitive species, such that readers have no way of evaluating the potential adverse effects of constructing any of the trails proposed in the DPEIR.

Table 5 on page 76 of Appendix D characterizes the Least Bell's Vireo (*Vireo bellii pusillus*), a species listed as endangered by federal and state governments, as "not expected" as a nesting species in the UCP planning area despite potentially suitable riparian habitat in Rose Canyon and scattered smaller pockets of riparian vegetation elsewhere in the planning area. In comments submitted to the City on the UCP Community Discussion Draft dated June 29, 2023, I noted that, from May 15 to July 19, 2021, birders P.J. Nell

and Jim Roberts repeatedly observed Least Bell's Vireos in Rose Canyon, including an adult feeding a begging juvenile on July 5 (https://ebird.org/checklist/S91321310) and July 9 (https://ebird.org/checklist/S91518140). My earlier letter included these links to the eBird checklists. The observations of Mr. Nell and Mr. Roberts contradict the DPEIR's determination that the Least Bell's Vireo can be excluded from analysis because this listed species is "not expected" within the project area.

The California Natural Diversity Data Base (CNDDB) provides maps showing the locations where special-status plants and wildlife have been documented. CEQA practitioners routinely use these occurrence maps to prepare adequate CEQA documents. The Final PEIR (FPEIR) should include maps from CNDDB showing the locations in the project area where special-status species have been documented, and the FPEIR's impact analysis should identify any and all special-status species known or likely to occur within proposed impacts areas. The FPEIR's impact analysis should take this relevant information into account to avoid or minimize any potentially significant impacts to special-status plant and wildlife species.

DPEIR'S IMPACT ANALYSIS PROVIDES INADEQUATE DETAIL TO EVALUATE IMPACTS OR TO IDENTIFY LESS-DAMAGING ALTERNATIVES

On a practical level, it makes little difference whether the EIR preparer has included or excluded the Least Bell's Vireo or any other special-status species from the DPEIR, because the impact analysis in Section 4.3 fails to describe or analyze the potential effects of any proposed action on any special-status species.

See, for example, the analysis of impacts to sensitive plants on page 4.3-53 of the DPEIR:

> As future site-specific projects are proposed, implementation of the City's regulatory framework for addressing biological resources impacts including the MSCP SAP, VPHCP, ESL Regulations, and Biology Guidelines would reduce potential impacts to sensitive plant species. However, at a program level of review and in the absence of project specific analysis, it is unknown whether all impacts to sensitive plant species would be fully mitigated to a less than significant level. **Therefore, at the program level of review, impacts to sensitive plant species resulting from project implementation would be significant.** [emphasis added in bold]

The same generic approach applies to sensitive wildlife (DPEIR at page 4.3-54):

> As future site-specific projects are proposed, implementation of the City's regulatory framework for addressing biological resources impacts including the MSCP SAP, VPHCP, ESL Regulations and Biology Guidelines would reduce potential impacts to sensitive wildlife species. However, at a program level of review and in the absence of project specific analysis, it is unknown whether all impacts to sensitive wildlife species would be fully mitigated to a less than significant level. **Therefore, at the program level of review, impacts to sensitive wildlife species resulting from project implementation would be significant.** [emphasis added in bold]

The same generic approach applies to critical habitats (DPEIR at page 4.3-55):

> Future development anticipated under the project that could potentially impact designated critical habitat would be required to comply with the applicable avoidance, minimization, and mitigation measures of the MSCP SAP and VPHCP, as well as the regulatory requirements of the MSCP SAP, ESL Regulations, and Biology Guidelines. As future site-specific projects are proposed, implementation of the City's regulatory framework for addressing biological resources impacts including the MSCP SAP, VPHCP, ESL Regulations and Biology Guidelines would reduce potential impacts to designated critical habitats. However, at a program level of review and in the absence of project specific analysis, it is not possible to ensure all impacts could be fully mitigated to a less than significant level. **Therefore, at the program level of review, impacts to critical habitat would be significant.** [emphasis added in bold]

The same generic approach applies to sensitive habitats (DPEIR at page 4.3-57):

> Required compliance with the established development standards contained in the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP would reduce potential impacts on sensitive vegetation communities resulting from future development. However, at a program level of review without project specific development proposals, it is cannot be guaranteed that every impact to sensitive habitats can be fully to a less than significant level. **Therefore, at the program level of review, impacts to sensitive habitats would be significant.** [emphasis added in bold]

The same generic approach applies to wetlands (DPEIR at page 4.3-59):

> In addition to the City regulatory requirements, all impacts on wetlands or other jurisdictional areas would be subject to regulation by the U.S. Army Corps of Engineers in accordance with Section 404 of the CWA, Regional Water Quality Control Board in accordance with Section 401 of the CWA, and CDFW under Section 1600 of California Fish and Game Code, as applicable. As no specific projects have been identified, it cannot be guaranteed that every future project would be able to demonstrate no net loss of wetland habitat. **Therefore, at a program level of review, impacts would be significant.** [emphasis added in bold]

The purpose of a Program EIR, or any CEQA document, is not simply to acknowledge that potentially significant impacts may occur from future actions, but to give the public and decision-makers adequate information upon which to evaluate the environmental costs of one or more proposed actions. Would a proposed trail wipe out one Nuttall's Scrub Oak or would it eviscerate a major grove of Nuttall's Scrub Oaks? Both impacts would be considered significant, but their magnitudes and regulatory implications are vastly different. The DPEIR is deficient in not providing the public and decision-makers with enough information to reach informed opinions about the environmental costs of the proposed actions.

Section 15126.6(a) of the CEQA Guidelines requires the lead agency to provide meaningful analysis of alternatives that "would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project." Section 15126.6(b) requires the lead agency to "focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." By providing only vague

information about the distribution of special-status plant and wildlife species in the project area, and issuing only generic acknowledgments of significant impacts to various broad categories of resources (sensitive plants, sensitive wildlife, sensitive habitats, etc.), the DPEIR fails to explain whether or how the project's basic objectives could be accomplished while avoiding or substantially lessening any significant adverse effects of the project. This is another serious inadequacy of the DPEIR as a CEQA document.

DPEIR Provides No Information Regarding Fragmentation, Edge, and Recreation/Trail Effects

Without adequate protection, the ecological value of urban habitats designated as MHPA will degrade over time due to habitat fragmentation, edge effects, and recreation/trail effects. The City did not take these effects into account before proposing new formal trails within the MHPA. Because the DPEIR provides almost no information about these categories of adverse effects, the information is provided here.

Fragmentation and Edge Effects

Urbanization typically includes residential, commercial, industrial, and road-related development (i.e., the "built" environment). At the perimeter of the built environment is an area known as the urban/wildland interface, or "development edge." In ecology, "edges" are places where natural communities interface, vegetation or ecological conditions within natural communities interact (Noss 1983), or patches with differing qualities abut one another (Ries and Sisk 2004). "Edge effects" are spillover effects from the adjacent human-modified matrix that cause physical gradients in light, moisture, noise, etc. (Camargo and Kapos 1995; Murcia 1995, Sisk et al. 1997) and/or changes in biotic factors such as predator communities, density of human-adapted species, and food availability (Soulé et al. 1988; Matlack 1994; Murcia 1995; Ries and Sisk 2004).

Edge effects and habitat fragmentation are among the principal threats to persistence of biological diversity (Soulé 1991). Edge-related impacts may include:

- Introduction/expansion of invasive exotic vegetation carried in from vehicles, people, animals or spread from backyards or fuel modification zones adjacent to wildlands.
- Higher frequency and/or severity of fire as compared to natural fire cycles or intensities.
- Companion animals (pets) that often act as predators of, and/or competitors with, native wildlife.
- Creation and use of undesignated trails that often significantly degrade the reserve ecosystems through such changes as increases in vegetation damage and noise.
- Introduction of or increased use by exotic animals which compete with or prey on native animals.

- Influence on earth systems and ecosystem processes, such as solar radiation, soil richness and erosion, wind damage, hydrologic cycle, and water pollution that can affect the natural environment.

Any of these impacts, individually or in combination, can result in the effective loss or degradation of habitats used for foraging, breeding or resting, with concomitant effects on population demographic rates of sensitive species.

Harrison and Bruna (1999) completed a review of a suite of studies dealing with fragmentation and edge effects and concluded that there is a general pattern of reduction of biological diversity in fragmented habitats compared with more intact ones, particularly with regard to habitat specialists. While physical effects associated with edges were predominant among species impacts, they found evidence for indirect effects including altered ecological interactions. Fletcher et al. (2007) found that distance from edge had a stronger effect on species than did habitat patch size, but they acknowledged the difficulty in separating those effects empirically. Many southern California plant and animal species are known to be sensitive to fragmentation and edge effects; that is, their abundance declines with fragment size and proximity to an edge (Wilcove 1985; Soulé et al. 1992; Bolger et al. 1997a,b; Suarez et al. 1998; Burke and Nol 2000).

Wildlife populations are typically changed in proximity to edges, either by changes in their demographic rates (survival and fecundity), or through behavioral avoidance of or attraction to the edge (Sisk et al. 1997; Ries and Sisk 2004). For example, coastal sage scrub areas within 250 meters of urban edges consistently contain significantly less bare ground and more coarse vegetative litter than do more "intermediate" or "interior" areas, presumably due to increased human activity/disturbance of the vegetation structure near edges (Kristan et al. 2003). Increases in vegetative litter often facilitate growth of non-native plants (particularly grasses), resulting in a positive feedback loop likely to enhance plant invasion success (Wolkovich et al. 2009). In another coastal southern California example, the abundance of native bird species sensitive to disturbance is typically depressed within 200 to 500 meters (650 to 1640 feet) of an urban edge, and the abundance of disturbance-tolerant species is elevated up to 1000 meters (3280 feet) from an urban edge, depending on the species (Bolger et al. 1997a).

Habitat fragmentation is usually defined as a landscape scale process involving habitat loss and breaking apart of habitats (Fahrig 2003). Habitat fragmentation is among the most important of all threats to global biodiversity; edge effects (particularly the diverse physical and biotic alterations associated with the artificial boundaries of fragments) are dominant drivers of change in many fragmented landscapes (Laurance and Bierregaard 1997; Laurance et al. 2007).

Fragmentation decreases the connectivity of the landscape while increasing both edge and remnant habitats. Urban and agricultural development often fragments wildland ecosystems and creates sharp edges between the natural and human-altered habitats. Edge effects for many species indirectly reduce available habitat use or utility in surrounding remaining areas; these species experience fine-scale functional habitat losses

(e.g., see Bolger et al. 2000; Kristan et al. 2003; Drolet et al. 2016). Losses of coastal sage scrub in southern California have resulted in the increased isolation of the remaining habitat fragments (O'Leary 1990). Fragmentation has a greater relative negative impact on specialist species (e.g., the Coastal Cactus Wren, *Campylorhynchus brunneicapillus*) that have strict vegetation structure and area habitat requirements (Soulé et al. 1992).

Specialist species have an increased risk of extirpation in isolated habitat remnants because the specialized vegetative structures and/or interspecific relationships on which they depend are more vulnerable to disruption in these areas (Vaughan 2010). In studies of the coastal sage scrub and chaparral systems of coastal southern California, fragment area and age (time since isolation) were the most important landscape predictors of the distribution and abundance of native plants (Soulé et al. 1993), scrub-breeding birds (Soulé et al. 1988; Crooks et al. 2001), native rodents (Bolger et al. 1997b), and invertebrates (Suarez et al. 1998; Bolger et al. 2000).

Edge effects that emanate from the human-dominated matrix can increase the extinction probability of isolated populations (Murcia 1995; Woodroffe and Ginsberg 1998). In studies of coastal sage scrub urban fragments, exotic cover and distance to the urban edge were the strongest local predictors of native and exotic carnivore distribution and abundance (Crooks 2002). These two variables were correlated, with more exotic cover and less native shrub cover closer to the urban edge (Crooks 2002).

The increased presence of human-tolerant "mesopredators" in southern California represents an edge effect of development; they occur within the developed matrix and are thus more abundant along the edges of habitat fragments, and they are effective predators on birds, bird nests, and other vertebrates in coastal sage scrub and chaparral systems and elsewhere (Crooks and Soulé 1999). The mammalian carnivores more typically detected in coastal southern California habitat fragments are resource generalists that likely benefit from the supplemental food resources (e.g., garden fruits and vegetables, garbage, direct feeding by humans) associated with residential developments. As a result, the overall mesopredator abundance, of such species as raccoons (*Procyon lotor*), opossums (*Didelphis virginiana*), and domestic cats (*Felis catus*), increases at sites with more exotic plant cover and closer to the urban edge (Crooks 2002). Although some carnivores within coastal sage scrub fragments seem tolerant of disturbance, many fragments have (either actually or effectively) already lost an entire suite of predator species, including mountain lion, bobcats (*Lynx rufus*), spotted skunks (*Spilogale gracilis*), long-tailed weasels (*Mustela frenata*), and badgers (*Taxidea taxus*) (Crooks 2002). Most "interior" sites within such fragments are still relatively near (within 250 meters of) urban edges (Crooks 2002).

Fragmentation generally increases the amount of edge per unit land area, and species that are adversely affected by edges can experience reduced effective area of suitable habitat (Temple and Cary 1988), which can lead to increased probability of extirpation/extinction in fragmented landscapes (Woodroffe and Ginsberg 1998). For example, diversity of native bees (Hung et al. 2015) and native rodents (Bolger et al. 1997b) is lower, and decomposition and nutrient cycling are significantly reduced (Treseder and

McGuire 2009), within fragmented coastal sage scrub ecosystems as compared to larger core reserves. Similarly, habitat fragmentation and alterations of sage scrub habitats likely have reduced both the genetic connectivity and diversity of coastal-slope populations of the Cactus Wren in southern California (Barr et al. 2015). Both Bell's Sparrows (*Artemisiospiza belli)* and California Thrashers (*Toxostoma redivivum*) show strong evidence of direct, negative behavioral responses to edges in coastal sage scrub; that is, they are edge-averse (Kristan et al. 2003), and California Thrashers and California Quail (*Callipepla californica)* were found to be more vulnerable to extirpation with smaller fragment size of the habitat patch (Bolger et al. 1991), demonstrating that both behavioral and demographic parameters can be involved. Other species in coastal sage scrub ecosystems, particularly the Cactus Wren and likely the California Gnatcatcher and San Diego Pocket Mouse (*Chaetodipus fallax*), are likely vulnerable to fragmentation, but for these species the mechanism is likely to be associated only with extirpation vulnerability from habitat degradation and isolation rather than aversion to the habitat edge (Kristan et al. 2003). Bolger (et al. 1997b) found that San Diego coastal sage scrub and chaparral canyon fragments under 60 acres that had been isolated for at least 30 years support very few populations of native rodents, and they suggested that fragments larger than 200 acres in size are needed to sustain native rodent species populations.

The penetration of exotic species into natural areas can reduce the effective size of a reserve in proportion to the distance they penetrate within the reserve: Argentine Ants serve as an in-depth example of edge effects and fragmentation. Spatial patterns of Argentine Ant abundance in scrub communities of southern California indicate that they are likely invading native habitats from adjacent developed areas, as most areas sampled greater than 200 to 250 meters from an urban edge contained relatively few or no Argentine Ants (Bolger 2007, Mitrovich et al. 2010). The extent of Argentine Ant invasions in natural environments is determined in part by inputs of urban and agricultural water run off (Holway and Suarez 2006).

Native ant species were more abundant away from edges and in areas with predominately native vegetation. Post-fragmentation edge effects likely reduce the ability of fragments to retain native ant species; fragments had fewer native ant species than similar-sized plots within large unfragmented areas, and fragments with Argentine Ant-free refugia had more native ant species than those without refugia (Suarez et al. 1998). They displace nearly all surface-foraging native ant species (Holway and Suarez 2006) and strongly affect all native ant communities within about 150 to 200 meters from fragment edges (Suarez et al. 1998; Holway 2005; Fisher et al. 2002; Bolger 2007; Mitrovich et al. 2010). Argentine Ants are widespread in fragmented coastal scrub habitats in southern California, and much of the remaining potential habitat for Blainville's Horned Lizards (*Phrynosoma blainvillii*) is effectively unsuitable due to the penetration of Argentine Ants and the subsequent displacement of the native ant species that horned lizards need as prey (Fisher et al. 2002). Invasion of Argentine Ants into coastal sage scrub has also shown a strong negative effect on the abundance of the Gray Shrew (*Notiosorex crawfordi*) (Laakkonen et al. 2001).

Recreation and Trail Effects

In the introduction to their study on the efficacy and perception of trail use enforcement at the 866-acre Del Mar Mesa Preserve in the City of San Diego, Greer et al. (2017:56–57) briefly summarized adverse effects of recreation upon ecological functions and values:

> The field of Recreation Ecology studies the impacts of recreation users on various biotic and abiotic elements of the landscape. Studies have shown that various types of passive outdoor recreation can result in displacement and reduction of wildlife, the trampling of native habitat and species, impacts to soil and water resources [although] users may not be aware of their impacts or legality of their actions. This balance between recreational use and natural resource conservation has become a key element of land management around the world. [citations omitted]

Greer et al. (2017) evaluated different approaches to resolving problems associated with creation, use, and maintenance of unpermitted trails at the Del Mar Mesa Preserve, activities that had fragmented and degraded the Preserve's natural communities for at least a decade at that time. They concluded, in part:

> This Study showed that soft enforcement aimed at public education and redirecting social norms was not sufficient in curbing illegal trail use in an urban natural area. The movement towards citations and the threat of citations was effective at redirecting behavior by making non-compliance more risky. This in turn had an unintended consequence of promoting hostility amongst a large user base.

The long-standing resource management problems associated with illegal trails at the Del Mar Mesa Preserve persist, with no clear resolution in sight (e.g., Karen Billing, San Diego Union Tribune, July 6, 2022: *Del Mar Mesa Preserve Tunnel Trail Vandalized* https://www.sandiegouniontribune.com/local/story/2022-07-06/del-mar-mesa-preserve-trail-vandalized).

SUMMARY AND CONCLUSION

MSCP planners, recognizing the tremendous challenge of maintaining important ecological values in a highly fragmented landscape over long periods of time, developed the Management Policies and Directives specifically to establish guardrails against further fragmentation and degradation of the few natural areas that remain. Specifically, the Subarea Plan requires trails be sited "in the least sensitive areas of the MHPA." Disregarding these existing commitments, the DPEIR targets for the establishment of formal trails some of the least disturbed, most-intact blocks of sensitive habitats in the MHPA.

Furthermore, where the MHPA's Urban Habitat Lands are part of a natural resource park, the Subarea Plan requires that the City manage these lands in accordance with a Natural Resource Management Plan. The City has not complied in Rose Canyon or at Nobel Hill, and is now proposing additional formal trails from which new illegal trails are likely to stem. Until detailed and adequate biological studies are conducted and enforcement strategies and implementation plans are developed, no new formal trails should be proposed in MHPA within the project area.

Apart from these problems, the DPEIR fails to provide the public and decision-makers with enough information to reach informed opinions about the environmental costs of the proposed actions. Additionally, by providing only vague information about the distribution of special-status species in the project area, and issuing only generic acknowledgments of significant impacts to various broad categories of resources, the DPEIR fails to explain whether or how the project's basic objectives could be accomplished while avoiding or substantially lessening any significant adverse effects of the project. In these ways, the DPEIR is inadequate as a CEQA document.

The available data, and the observations I made during my recent site visit, indicate to me that the proposed trails are likely to have significant adverse effects under each of the five thresholds identified in the DPEIR. Apart from the one-time loss of sensitive habitats from Project grading, the proposed trails would result in ongoing, long-term significant adverse effects to the remaining MHPA due to habitat fragmentation, creation of new habitat edges, and increased recreation/trail effects (as reviewed on pages 21–25 of this letter). These classes of impacts, which would be extensive and unavoidable, are not adequately evaluated or disclosed in the DPEIR. For these reasons, all trails through MHPA should be removed from the Project.

If any recipient of this letter has questions, please call me at (562) 477-2181 or send e-mail to robb@hamiltonbiological.com.

Sincerely,

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Attachment 7

Image Source: NearMap (flown September 2023)

University Community Plan Boundary

USFWS Critical Habitat

Spreading Navarretia

San Diego Fairy Shrimp

FIGURE 8
USFWS Critical Habitat

M:\JOBS5\9775\common_gis\BioRpt\Fig8.mxd 12/28/2023 bma

Attachment 8

Image Source: NearMap (flown September 2023)

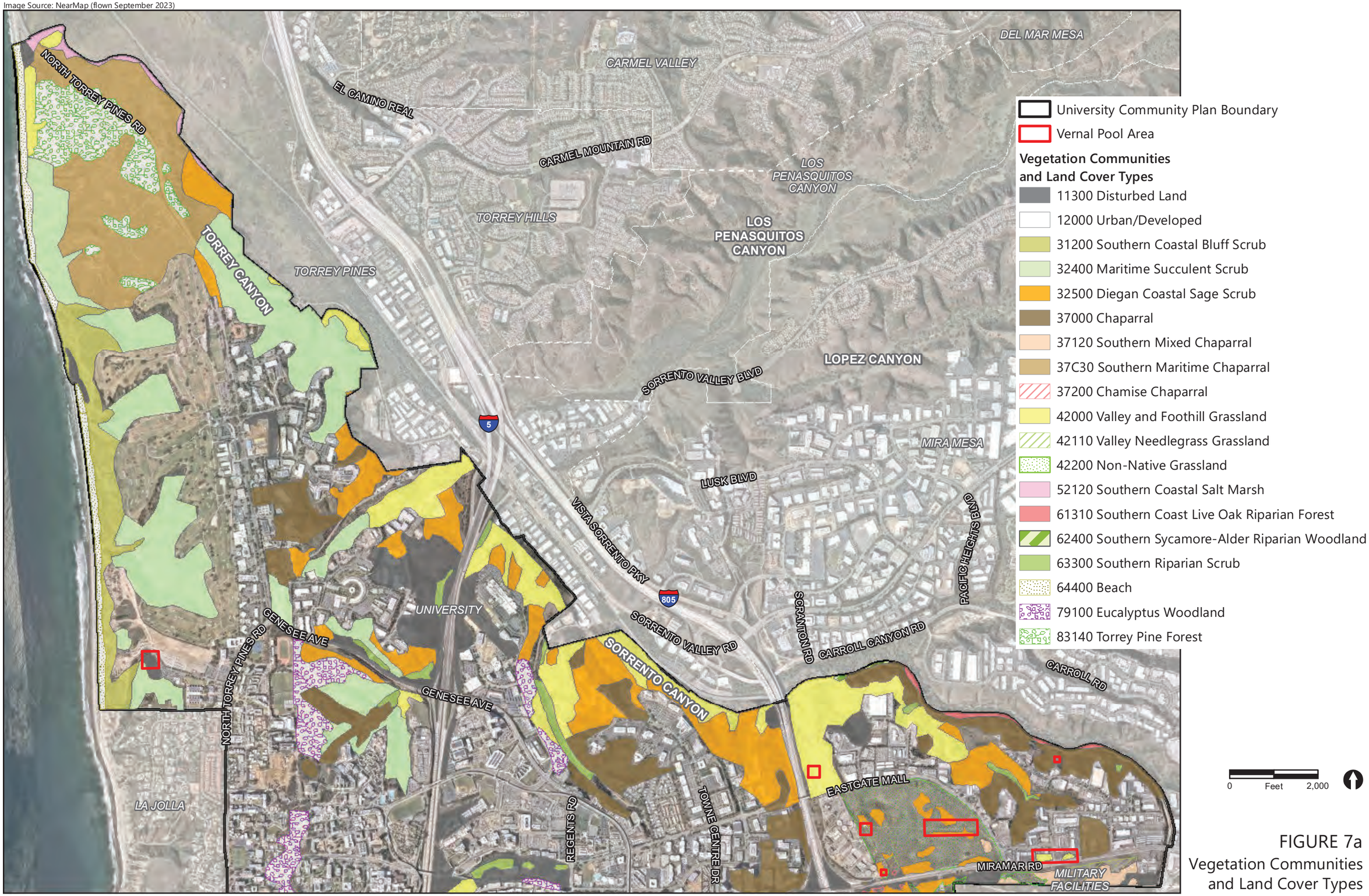


FIGURE 7a
Vegetation Communities and Land Cover Types

M:\JOBS5\9775\common_gis\BioRpt\Fig7a.mxd 01/05/2024 bma

Image Source: NearMap (flown September 2023)

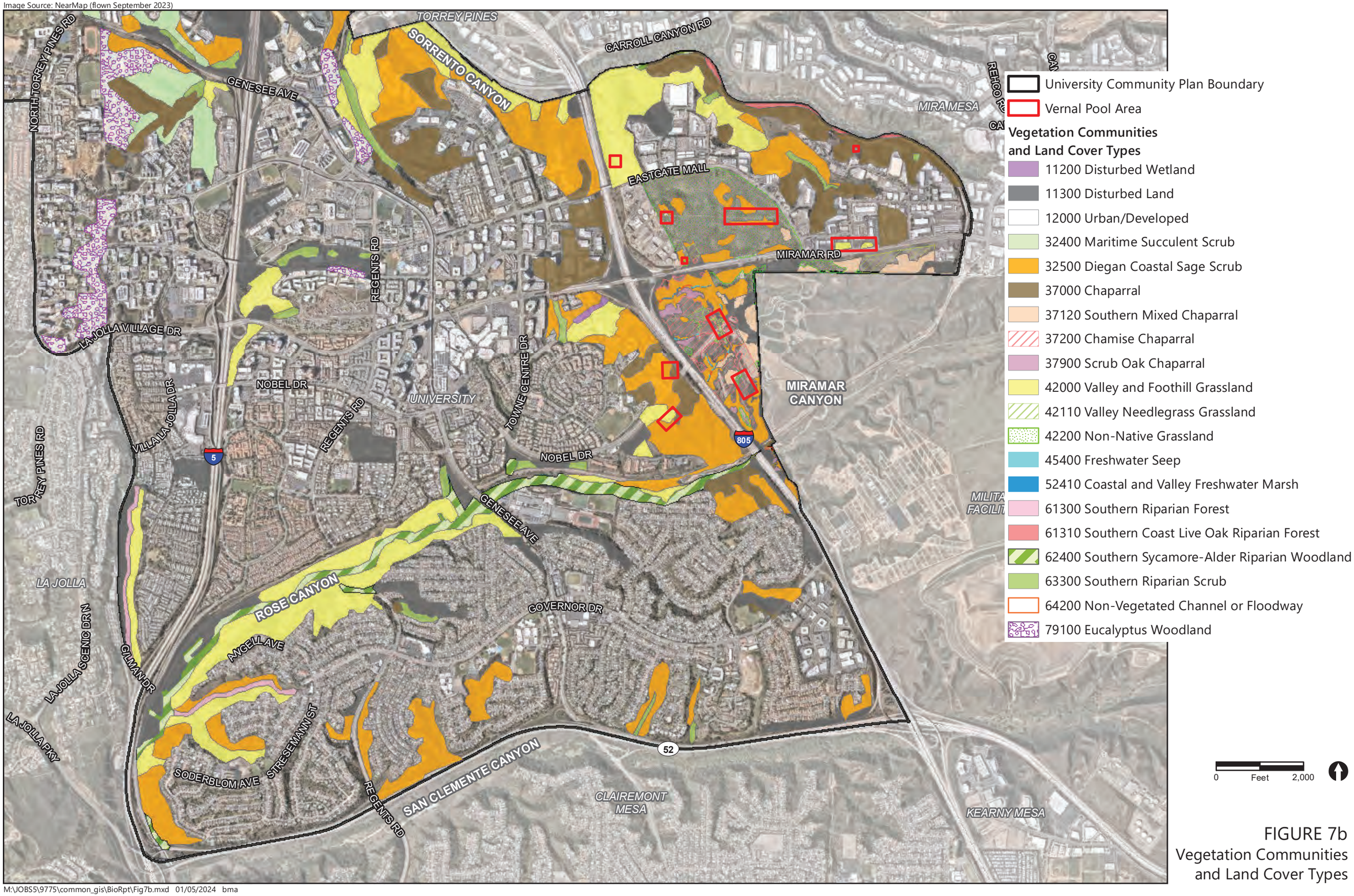
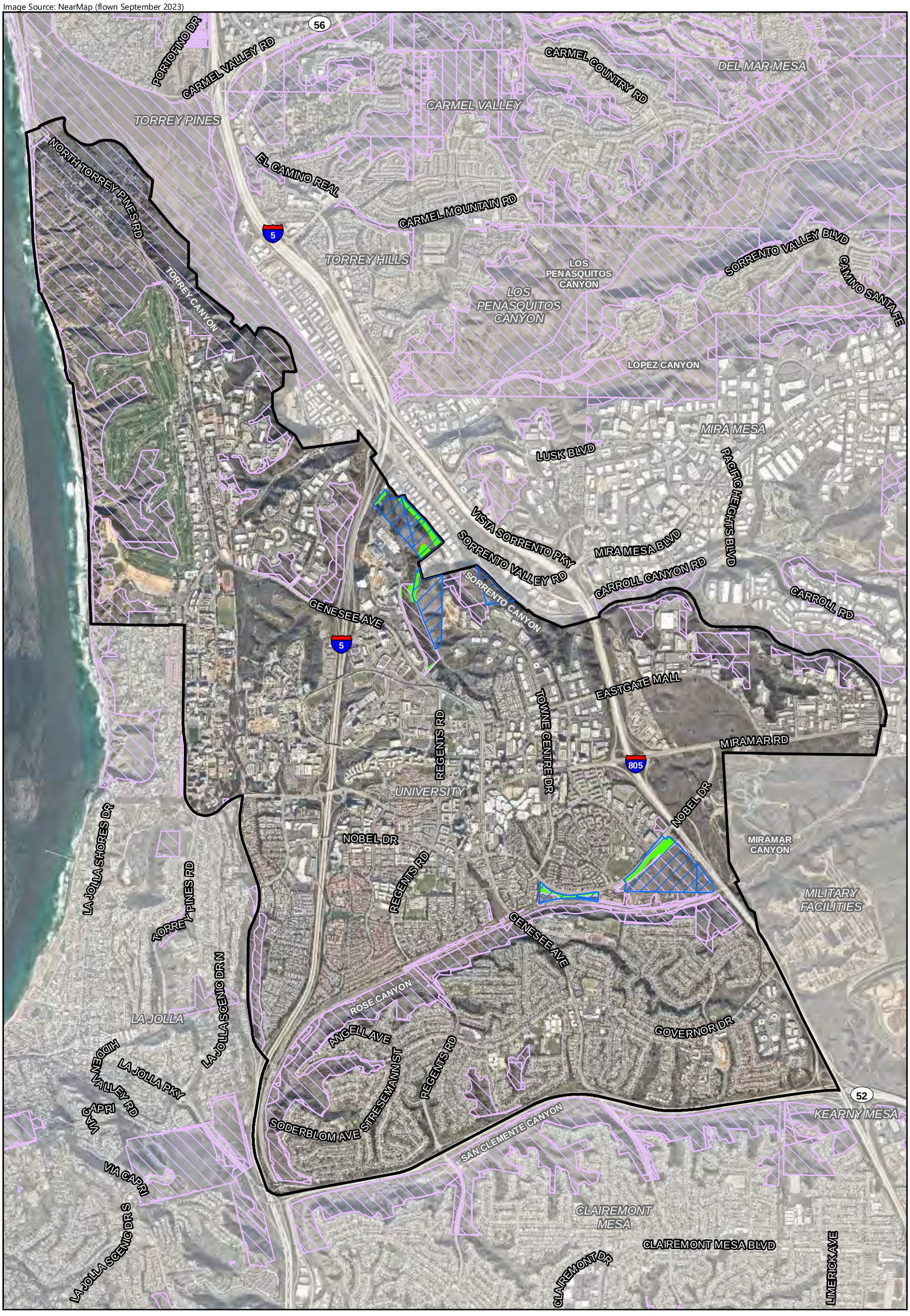


FIGURE 7b
Vegetation Communities and Land Cover Types

M:\JOBS5\9775\common_gis\BioRpt\Fig7b.mxd 01/05/2024 bma

Attachment 9

Image Source: NearMap (flown September 2023)



University Community Plan Boundary

MHPA Additions

City Open Space to be Dedicated Pursuant to Charter 55

Existing Conserved Lands

FIGURE 4

Post-Project MHPA and Conserved Lands

M:\JOBS5\9775\common_gis\BioRpt\Fig4.mxd 03/01/2024 bma

Attachment 10

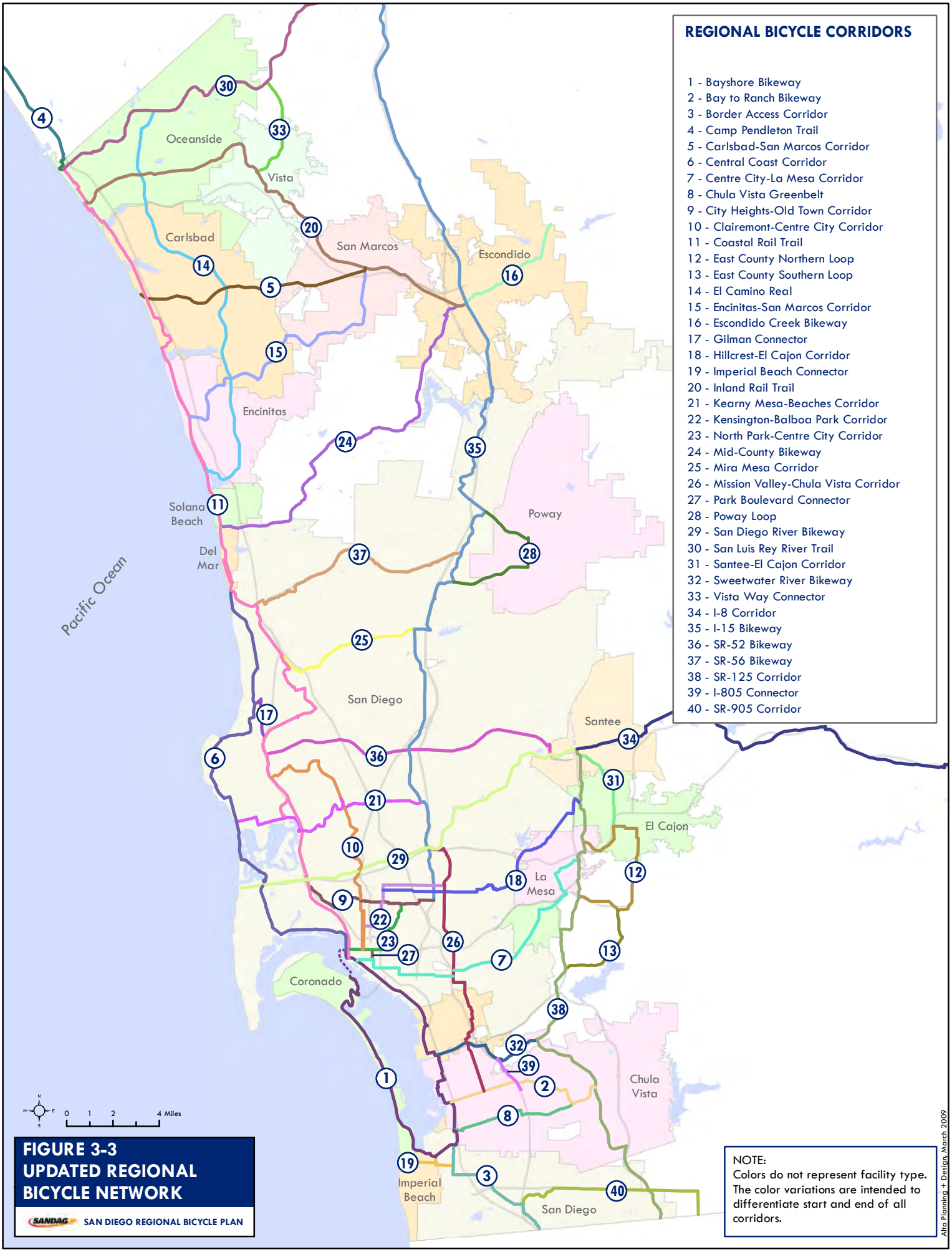


FIGURE 3-3
UPDATED REGIONAL BICYCLE NETWORK

SANDAG SAN DIEGO REGIONAL BICYCLE PLAN

Attachment 11

#207

(R-2014-137) #B
REVISED COPY

RESOLUTION NUMBER R- 308597

DATE OF FINAL PASSAGE DEC 26 2013

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO ADOPTING THE CITY OF SAN DIEGO BICYCLE MASTER PLAN UPDATE.

WHEREAS, on May 28, 2002, the City Council of the City of San Diego approved Resolution No. R-296581, adopting the City of San Diego's Bicycle Master Plan; and

WHEREAS, the City of San Diego Bicycle Master Plan Update provides direction for expanding the existing bikeway network, connecting gaps, providing for improved local and regional connectivity, and encouraging bicycling as a transportation mode; and

WHEREAS, on July 25, 2013, the Planning Commission of the City of San Diego considered the City of San Diego Bicycle Master Plan Update, and pursuant to Planning Commission Resolution No. 4535-PC, the Planning Commission voted to recommend City Council adopt the City of San Diego Bicycle Master Plan Update, certify the Environmental Impact Report No. 290781 and adopt the Findings, Statement of Overriding Considerations and Mitigation, Monitoring and Reporting Program No. 290781. In addition, the Planning Commission recommended that the Findings of Fact and Statement of Overriding Considerations be revised to include additional language to balance vehicular level of service goals with bicycle network expansion goals, and include complete streets language in the project benefits; and

WHEREAS, on December 9, 2013, the City Council of the City of San Diego held a public hearing for the purpose of considering the adoption of the City of San Diego Bicycle Master Plan Update; NOW, THEREFORE,

BE IT RESOLVED, by the City Council of the City of San Diego, that the Council adopts the City of San Diego Bicycle Master Plan Update as amended to remove the Rose Canyon and Roselle Canyon segments, a copy of which is on file in the office of the City Clerk as Document No. RR- 308597.

BE IT FURTHER RESOLVED, that the City Attorney's Office and staff are directed to come back within 30 days with appropriate language regarding a proposed bicycle advisory committee.

APPROVED: JAN I. GOLDSMITH, City Attorney

By _____
Corrine L. Neuffer
Deputy City Attorney

CLN:dr:als
11/21/13
12/11/13 Revised
Or.Dept:DSD
Doc. No. 631945_2

I hereby certify that the foregoing Resolution was passed by the Council of the City of San Diego, at this meeting of DEC 09 2013.

ELIZABETH S. MALAND
City Clerk

By _____
Deputy City Clerk

Approved pursuant to Charter section 265(i):

_____ _____
(date) TODD GLORIA, Council President

Passed by the Council of The City of San Diego on DEC 09 2013, by the following vote:

Councilmembers	Yeas	Nays	Not Present	Recused
Sherri Lightner	☑	☐	☐	☐
Kevin Faulconer	☑	☐	☐	☐
Todd Gloria	☑	☐	☐	☐
Myrtle Cole	☑	☐	☐	☐
Mark Kersey	☑	☐	☐	☐
Lorie Zapf	☑	☐	☐	☐
Scott Sherman	☑	☐	☐	☐
David Alvarez	☑	☐	☐	☐
Marti Emerald	☑	☐	☐	☐

Date of final passage DEC 26 2013.

(Please note: When a resolution is approved by the Council President as interim Mayor, the date of final passage is the date the approved resolution was returned to the Office of the City Clerk.)

AUTHENTICATED BY:

TODD GLORIA, COUNCIL PRESIDENT
as interim Mayor of The City of San Diego, California.

(Seal)

ELIZABETH S. MALAND
City Clerk of The City of San Diego, California.

By _____, Deputy

Office of the City Clerk, San Diego, California

Resolution Number R- 308597

San Diego Regional Chamber

402 West Broadway, Suite 1000
San Diego, CA 92101-3585
p: 619.544.1300
www.sdchamber.org

April 29, 2024

Heidi von Blum
Planning Director, City of San Diego
202 C Street
San Diego, CA 92101

Subject: Comments Regarding Draft UC Plan Update

Dear Director von Blum,

On behalf of the San Diego Regional Chamber of Commerce (Chamber), please accept this comment letter on the University Community Plan Update (UCPU) efforts to date. As the largest local Chamber on the West Coast, representing 2,200 businesses and an approximate 300,000 jobs, we value the importance of ensuring more housing and jobs are available in the region. The UCPU is especially critical to our City, as housing inventory continues to remain very low and increasing median home prices make it unaffordable for many San Diegans such as working families, college students, and recent graduates to live here. The Chamber's mission is to make the San Diego region the best place to live and work, and the proposed UCPU supports that effort.

The University community planning area has undergone significant change since its last update and the Chamber views this process as a great opportunity to advance new housing and future business development to pave a way for our region's future workforce. It is essential to develop the area as a self-sufficient community that will offer a balance of housing, business, culture, education, and recreation. To that end, it is critical that the City leverages the opportunity to move forward with a land use scenario that ensures the highest amount of density for housing and jobs. With the completion of the UC San Diego Blue Line Trolley Extension, the Chamber encourages the City to leverage this new access to sustainable transportation choices by providing more opportunities to expand not only the City's housing inventory, but access to retail and employment centers, health care facilities, public spaces, and more for working professionals and students in the area.

The Chamber is in full support of the comment letter submitted by BIOCOM that states that adopting Urban Flex and Prime Flex land use in the EMX-1 zone in the North Torrey Pines area would open new and important opportunities. As stated in the letter, our region's main competitors in the life science industry already provide mixed use and residential opportunities within their life science clusters, which is a major factor in why they are successful in recruiting and retaining top talent and businesses. San Diego's life science industry is an economic engine in our region, and these amendments to the proposed plan are needed to continue to leverage the industry's full potential to further boost our economy. If we want to continue to market our region as a top choice for the life science industry, we must ensure we remain competitive, and by not allowing for mixed use and residential opportunities in the North Torrey Pines area we are not allowing San Diego's life science industry to be as competitive as possible. We agree that including those designations would not have a significant impact on the City's environmental analysis, thus, would not delay the approval of the UCPU. We urge you to include these designations in the UCPU.

The Chamber is supportive of the UCPU and supports its adoption with the designations outlined above. I would like to convey our thanks to the committee for beginning this important conversation. If you have any questions, please contact Evan Strawn, Policy Advisor for the Chamber, estrawn@sdchamber.org.

Sincerely,

Jerry Sanders
President & CEO
San Diego Regional Chamber of Commerce

From:	Thomas DeFranco
To:	PLN University Community Plan Update
Cc:	Lukes, Suchitra; Tomlins, Coby; Tuere Fa"aola; Stacey Cooper
Subject:	[EXTERNAL] SANDAG Comments on second Draft University Community Plan Update
Date:	Monday, April 29, 2024 12:27:04 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png 2024Final_University CPU_Staff Comment Matrix.xlsx

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This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

SANDAG appreciates the opportunity to provide comments on the second Draft University Community Plan Update. Please see the attached matrix with staff's full comments.

We appreciate the City's willingness to coordinate in advance with SANDAG on these planning documents to align them with our current and future Regional Plans and CMCPs. If further coordination is needed between SANDAG and City staff please let me know.

Thank you in advance for taking our recommendations into consideration.

Thomas DeFranco
Regional Planner II

619.230.2758 office
401 B Street, Suite 800, San Diego, CA 92101

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SANDAG Comments on University City CPU

Chapter/Appendix Section	Page Number	Heading	Staff Name	Comment	Comment Type
	4 114	Figure 22 and Figure 23	Mimi Morisaki	recommend adding in I-5/Voigt Direct Access Ramp (CC111 in 2021 RP) and I-805/Nobel Drive Transit Operational Improvement (CC114) to the maps	
	4 114	Figure 22 and Figure 23	Tim Garrett	The aerial skyway shown in Figure 22 is not included SANDAG's adopted 2021 Regional Plan.	
	4 114	Figure 22 and Figure 23	Tim Garrett	Rapid 870 is difficult to see in Figure 22, its routing is not consistent with 2021 Regoinal Plan, and it is considered an unconstrained project in the Initial Concept for the Draft 2025 Regional Plan. Recommend removing from the figure and relying instead on the broader Next Gen Rapid layer.	
	4 114	Figure 22 and Figure 23	Tim Garrett	There are no longer existing bus routes on Gilman Drive south of Villa La Jolla Drive. MTS route 150 was discontinued after the opening of the Mid Coast Trolley Extension.	
	4 114	Figure 22 and Figure 23	Tim Garrett	MTS routes 201/202 have been rerouted with the opening of Mid Coast Trolley Extension away from Voigt Drive in favor of La Jolla Village Drive between UC San Diego and UTC. The new routing is shown in green, but the old routing in black should be removed. This applies to both Figure 22 and Figure 23.	
	4 110		Marisa Mangan & Josh Clark	Class IV-First' approach evident in Figure 20, but the segment of Genesee north / west of Campus Point Drive is a mix of cycling classification facility types that may result in confusion for users. The east/southbound class II segment overlapping I-5 is of particular concern given recent SANDAG Vision Zero Action Plan findings pointing to this segment as a systemic safety priority corridor.	
	4 110	Figure 20	Josh Clark	Recommend inclusion of the Regents Road Class I Bike Path spanning Rose Canyon (CC92)	CMCP consistency
	4 110	Figure 20	Josh Clark	Recommend inclusion of the Rose Canyon Class I Bike Path from Judicial Drive to Gilman Drive (CC87) (AT023) this project could convert existing rail and / or be completed with a realignment during the Miramar Tunnels project.	CMCP and 2021 Regional Plan consistency
Appendix	203-204	Tables 4 and 5	Josh Clark	The parallel alternative to the above Rose Canyon Bike Path is the La Jolla Colony Dr Gilman Dr to Palmilla Dr Class IV (One Way). It does not appear there is existing ROW to accommodate Class IV protected bike lanes in each direction in Table 5: Planned Street Classifications. Please add this segment to Table 5 converting the Existing "4-Ln Collector w/ TWLTL" to Planned "2-Ln Collector w/ TWLTL" for implementation of an appropriately wide Class IV bikeway in each direction.	
Appendix	203-204	Tables 4 and 5	Josh Clark	Same concern for existing or planned street classifications that will dedicate ROW for implementation of a parallel Rose Canyon Coastal Rail Trail alignment on Palmilla Dr, Arriba St, Regents Rd, Nobel Dr, (then adopted Regional Bike Network alignment) Judicial Dr, Eastgate Mall	Adopted Regional Bike Network consistency

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LATHAM & WATKINS LLP

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Madrid	

April 29, 2024

VIA EMAIL

Suchi Lukes
Principal Planner, University City
202 C Street
San Diego, CA 92101
planuniversity@sandiego.gov

Re: University Community Plan Update

Dear Ms. Lukes:

Thank you for the opportunity to review and submit comments on the University Community Plan Update ("Draft Update"). Our client, Unibail -Rodamco –Westfield ("URW"), has appreciated the opportunity to participate in the community outreach process for the Draft Update, and we have appreciated Staff's engagement throughout the process.

URW owns and operates Westfield University Towne Centre ("UTC"), a one-of-a-kind lifestyle destination in the heart of University City. Over more than a decade, URW has invested in significant redevelopment of the UTC site, and has participated in the development of a major trolley line station and transit hub on and adjacent to the UTC site. URW continues to invest in the UTC property, and just started construction on another redevelopment building 50,000 square feet of new luxury stores and world class restaurants in part of the footprint where the old Nordstrom was located along La Jolla Village Drive.

Given URW's major holdings in University City, we appreciate the opportunity to submit these comments to ensure that UTC will continue to provide a dynamic outdoor center with world-class retail that is a desirable place for people to come, while looking forward to opportunities to provide mixed-use amenities in strategic locations in the future. To that end, we offer the following comments to clarify a handful of items:

1. **Public Access**: The Draft Update indicates that certain developments will be required to provide public spaces, which are to be subject to a public recreation easement and "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." (p. 192). We understand that the requirement to record a public recreation easement will be removed from the Draft Update, and we agree with that change. However, we ask that the Draft Update further clarify that, for properties with multiple tenants or businesses that may have differing operating hours, the "hours of business operation" should be interpreted to mean the building owner's general hours of operation. For

example, for UTC mall, the current hours of operation are 10:00 a.m. – 8:00 p.m. Monday through Saturday and 11:00 a.m. – 7:00 p.m. on Sunday. However, an individual tenant may open earlier (such as a fitness studio) or later (such as a movie theater). In this example, to avoid confusion, the mall's hours of operation should control with respect to public access hours.

2. **Urban Design Graphics**: The Draft Update includes a variety of images and figures to depict potential Urban Design elements or strategies (pp. 49-101). Many, but not all, of these images and figures are noted as "examples." We recommend clarifying throughout the Draft Update that images and figures are examples or are illustrative in nature to provide future development the ability to utilize creative designs situated to the particular site. In particular, we request this clarification for images and figures that depict opportunities on the UTC site, such as those on pages 86-89.

3. **Transit Plaza/Mobility Hub**: The Draft Update depicts a Transit Plaza/Mobility Hub in the southwest corner of the UTC property (pp. 86-87). We note that this area has already been developed with the UTC Trolley Station and MTS transit center; the remaining areas are parking and slopes. We recommend clarifying that this depiction does not limit the ability to provide mixed-use development adjacent to the transit center (e.g., in the area shaded as "Transit Plaza/Mobility Hub") in the future.

4. **Change of Use of Existing Buildings**: The Draft Update states: "Interior improvements to an existing building that do not involve a change of use or provide additional floor area or improvements are not subject to the University CPIOZ-Type A supplemental development regulations." (p. 185). We request that the language be revised to clarify that a change of use to one that is allowed by the applicable zoning would not trigger the University CPIOZ-Type A supplemental development regulations. This is an important clarification for a retail center with multiple tenants in a flexible mixed-use zone. If this is not revised, it may be more difficult to site a tenant who has a different type of business than the one previously located in the space.

Thank you again for the opportunity to submit these comments. We would be happy to discuss any of these items at your convenience.

Very truly yours,

Jennifer K. Roy
of LATHAM & WATKINS LLP

cc: Kim Brewer, URW
Clif Williams, Latham & Watkins LLP

Friends of Rose Canyon Comment on March 2024 Draft University Community Plan
Re: List of edits required to remove proposed trails from MSCP habitat
April 29, 2024

The following is a list of the Pages/Maps in the March 2024 Draft University Community Plan that show proposed/existing informal trails in MSCP habitat. Some of the proposed trails have additional problems: they are partially in the Railroad ROW, which is illegal, or on private property. These pages/maps need to be edited to reflect the removal of these proposed trails. This list should assist in making the changes.

P. 50
Delete all "open space connections" through Rose Canyon (the heavy green lines), except for the City's recognized trail on the south side of the RR tracks going west from Genesee Ave.
(Note: the proposed trail across Rose Canyon shown connecting the two linear parks on Regents Road is not only in the MSCP, it would cross the RR tracks, which is illegal.)

Delete all "Enhanced Multi-Modal Paths" in Rose Canyon. They are in the MHPA. Delete the "Enhanced Multi-Modal Path" on the north side of the RR tracks going west from Genesee: that is in the MSCP for a distance and otherwise on private property.

Delete the "Enhance Multi-Modal Path" in Roselle Canyon from Eastgate Mall to Roselle St. That is partially in the MHPA.

P. 82- 83
Delete the dotted black lines that go from Eastgate Mall to Roselle Street, and from the bottom of the canyon up to Towne Centre Drive and up to Campus Point Drive. Much of this is in the MSCP.

P. 84-85
Public Realm: Delete the orange square at the north end of Towne Ctr Drive – that is now private property. The City approved the Towne Center View Project in 2023 that included a street vacation and conversion to private property for Biomed Realty for everything beyond Westerra Court.
Placemaking: Delete the green dotted lines in the canyon between Eastgate Mall and Campus Pointe Drive and from the canyon up to Towne Ctr Drive: that is largely in the MSCP, and that end of Towne Centre Drive (past Westerra Court) is now private property.
Connectivity: Delete the dotted lines in the canyon extending from Eastgate Mall to Roselle Street with branches up to Towne Ctr Drive and Campus Point. Much of that is in the MHPA.

P. 86-87
Delete all the "Potential Trail Opportunities" except for the existing trail that goes from Genesee Avenue west through Rose Canyon. They are all partially or fully in the MSCP.

P. 88-89
Public realm: Delete all the trails in Rose Canyon except the existing recognized trail from Genesee Avenue going west. They are all partially or fully in the MHPA.
Placemaking: Delete all the trails in Rose Canyon except the existing recognized trail from Genesee Avenue going west. Delete the trail in the canyon going north from Eastgate Mall. They are all

partially or fully in the MHPA. It's unclear why there is a large orange area on the property of University City High School.
Connectivity: Delete all the trails in Rose Canyon except the existing recognized trail from Genesee Avenue going west. Delete the trail in the canyon going north from Eastgate Mall. They are all partially or fully in the MHPA. Delete the large pink Micro Mobility Hub in Rose Canyon near the end of Regents Road north of the railroad tracks.

P. 90-91
Delete the proposed trail on the north side of the RR tracks from I-5 to La Jolla Colony Drive. That is in the RR ROW, which is illegal.
Delete the proposed trail north of the RR tracks from La Jolla Colony Drive to Regents Road. That is on private property.
Delete the proposed trail from the west end of Rose Canyon going up the finger canyon (toward Governor Drive, which is not shown). That is MHPA.

P. 92-93
Public Realm
Delete the proposed trail on the north side of the RR tracks from I-5 to La Jolla Colony Drive. That is in the RR ROW, which is illegal.
Delete the proposed trail north of the RR tracks from La Jolla Colony Drive to Regents Road. That is on private property.
Delete the proposed trail from the west end of Rose Canyon going up the finger canyon (toward Governor Drive, which is not shown). That is MHPA.

Placemaking
Delete the proposed trail from the west end of Governor Dr. (starting with "Health Loop") through Rose Canyon. That is MHPA.

Connectivity
Delete the proposed trail from the west end of Governor Dr. (starting with "Health Loop") through Rose Canyon. That is MHPA.
Delete the proposed trail on the north side of the RR tracks from I-5 to La Jolla Colony Drive. That is in the RR ROW, which is illegal.
Delete the proposed trail north of the RR tracks from La Jolla Colony Drive to Regents Road. That is on private property.

P. 94-95
Delete: Potential trails in Rose Canyon from the west end of Governor and from Marcy Park. Those are in MHPA and extremely steep slopes.
Delete the proposed trail on the north side of the RR tracks from I-5 to La Jolla Colony Drive. That is in the RR ROW, which is illegal.
Delete the proposed trail north of the RR tracks from La Jolla Colony Drive to Regents Road. That is on private property.
Delete: All "potential trails" east of Genesee Ave.

P. 96-97
Public Realm and Placemaking AND Connectivity maps

Delete potential trails from west end of Governor and Marcy Park in Rose Canyon
Delete all "Community Loop" trails in Rose Canyon east of Genesee Avenue (both north and south of the RR tracks)
Delete: North of the tracks, remove trail from I-5 to La Jolla Colony Drive (mostly in the RR ROW, which is illegal) and between La Jolla Colony Drive and Regents Road (on private property).

P. 98-99
Delete proposed trails in Rose Canyon (south of Nobel Drive)

P. 100 -101
Public Realm and Placemaking AND Connections maps:
Delete proposed trails in Rose Canyon

P. 110
Delete: Purple line depicting SANDAG 2021 Regional Bike Adopted Bike Network
This is a very old proposed alignment for the Coastal Rail Trail (CRT) which was unanimously removed from consideration by the City Council when it updated the City's Bike Master Plan in 2013. They City has since chosen a different CRT alignment (based on extensive public input) that goes up Gilman Drive. The City has since completed final design, environmental, and put millions of dollars toward final construction of that CRT alignment. The old alignment still shows up in the SANDAG Bike Network because that document has not been updated in over 10 years.

P. 131
Figure 27
Delete all trails in Rose Canyon except the existing "Formal Trail" from Genesee to Bothe St (near SR-52) and the trail from the end of Regents on the south side of the canyon. They are all fully or partially in the MHPA.
Delete the trail from Eastgate Mall to Roselle Street and the branches off it up to Towne Centre Dr. and Campus Pt. Drive. Much of this is in the MHPA.
Delete the "existing informal" trail west of Genesee Avenue on the north side of the RR tracks. A portion of the distance is in the MHPA, and most of the rest is on private property.

ABASD | ASIAN BUSINESS ASSOCIATION

April 29, 2024

Heidi von Blum
Planning Director, City of San Diego
202 C Street
San Diego, CA 92101

Re: Comments Regarding Draft UC Plan Update

Dear Chair Heidi,

On behalf of the Asian Business Association of San Diego (ABA), I'd like to express our support for adopting the option that provides the most amount of housing within the University City Community Plan Update.

Today, there are over 33,000 Asian and Pacific Islander (API) owned businesses in San Diego County.. Based on our research we found that in 2021, API-owned businesses generated $5 billion in regional economic impact, a significant figure that underscores the sales activity and revenue from these businesses. Every day we work these businesses, and for them to continue to be successful they must rely upon employees and consumers that can afford to live in San Diego.

ABA supports a community plan update that focuses on increasing the amount of housing in San Diego, supports the growth of businesses and the resulting positive economic impact, as well as supports the growth of educational institutions like UC San Diego. Therefore, we support the comment letter submitted by BIOCOM that states that adopting Urban Flex and Prime Flex land use in the EMX-1 zone in the North Torrey Pines area would open new and important opportunities. We concur that including those designations would not have a significant impact on the City's environmental analysis, and not further delay adoption of the plan update.

The University Plan is a plan representative of the goals ABA supports, and thus supports its adoption and the amendments we have outlined.

Sincerely,

Jason Paguio
President & CEO

cc: The Honorable Joe LaCava
The Honorable Kent Lee

7675 Dagget Street Ste 340 San Diego CA 92111
www. ABASD.org (858) 277-2822

DEIR Flaws

There are structural flaws in the University draft environmental impact report (EIR). Below are specific items that must be addressed and changed. Please consider alternate options before the process moves forward as currently identified in the draft EIR.

I. **The City Must Reduce the Proposed Housing Density By at Least 50%** The current proposed plan will add an additional 30,480 housing units to University City's (UC) existing 26,520 units while increasing the number of residents from 64,206 to a total of 129,566, and doubling the population. This proposal is an example of very poor planning. SANDAG's current Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase the UC community alone, is ridiculous. The existing UC infrastructure will not support such a population increase. There is no additional land to provide more housing. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. **Governor Drive must Not Be Reduced to Two Lanes**. A two lane will restrict emergency egress in the event of a wildfire and murder thousands of residents. No changes to Governor Drive are warranted without a current Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive and emergency egress.

III. **The Proposed Up-zoning of the South UC Shopping Centers Must is Reduced**. The City proposed Sprouts and Vons shopping centers change is to zone to CC-3-8, with 0-73 dwelling units per acre. This zoning allows 100 foot-high structures with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The proposed plan does not consider that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City must reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV**. Customer Parking Must be Maintained at South UC Shopping Centers**. The current quantity of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU must contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. **The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers**. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable because it is located in La Jolla along Torrey Pines Road far away from any UC residential neighborhoods.

VI. **A Greater Number of Solutions are Needed for Larger, Usable Park Space**. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the Park Score Index.

VII**. The City's Argument that People will Give up their Cars for other forms of transportation is Groundless.** No studies exist to indicate that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities because the patrons are too young and old. There are no provisions that allow emergency evacuation in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's attempt to suggest that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work is ridiculous.

VII. **The University CPU Must Address Wildfire Evacuations & Safety**. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. The DEIR has no analysis of current and projected emergency response times. UC is already behind city targets to implement adequate fire and safety coverage. More than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for emergency and evacuation services, and provide fire safety infrastructure and additional vehicular egress is completed before further density is increased.

VIII. **The University CPU Must to Take into Account UC's Vulnerability to Wildfires.** Approximately 75 percent of UC falls within a Very High Fire Hazard Severity

Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development. Reducing vehicular access on Governor Drive exponentially increases the risk of successful emergency evacuation.

IX**. Housing Affordability Must Be a High Priority.** Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. **The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements.** A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Tom Cartier

Tom Cartier
UC Fire Safe Council Treasurer
Standley Community Recreation Group Representative

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 stepback 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

April 26, 2024

Feedback on Parks and Recreation Planning
University Community Plan Update

RE: Revised Draft – University Community Plan, March, 2024

Andrew Wiese,
Chair, UC Plan Update Subcommittee, UCPG

Dear Suchi, Nathan, and Coby,

Thank you to you and your parks and recreation team for revisions to the Parks and Recreation element of the **Draft University Community Plan (D-UCP).**

Parks and Recreation has been one of the most common areas of concern for UC residents from the earliest days of the update. The subject is close to the community's heart. As a resident who uses UC parks several times every week, it is especially close to mine.

I wanted to take this opportunity to provide additional feedback, recognizing progress, and encouraging additional improvements in the Final UC Plan. I look forward to working with you and the community on implementing these suggestions.

Please let me know if you have any questions. I am available to discuss any of these comments at your convenience.

Sincerely,

Andy

Andrew Wiese
Chair, UC Plan Update Subcommittee, UCPG

Comments on Parks and Recreation Element:

First, I want to restate my appreciation for the positive features of the Parks and Recreation Element.

The Draft-UCP retains some positive features of the Discussion Draft. These include:

- Three new "*Linear Parks*" on Regents Road and Governor Drive and a pedestrian promenade on Executive Drive.
- Incentives for residential development to meet parks and recreation requirements on site.
- Incentives for commercial developments to meet detailed Urban Public Space requirements that will add to the public realm.

In addition, I appreciate the hard work and creative thinking that led to **revisions since the Discussion Draft, including:**

- The proposal for a new Torrey Pines Neighborhood Park
- Rescoring existing and future facilities to ensure accuracy of park facilities and needs. (e.g., Torrey Pines City Park, Montrose Park)

At the same time, I have several **Areas of General Concern** and a variety of **Specific Recommendations.**

Specific changes/additions to language of the **Draft University Community Plan** are marked using ***underlined, bold (green) text with italics.***

General Points of Concern:

1) Planned Recreational Value Deficit

I remain concerned with the **projected "parks points" deficit** in the Draft University Community Plan., The Plan ***does not meet*** the City's Recreational Value Standard established in the *Parks Master Plan*.

Consequently, the D-UCP **does not meet its stated goal** to:

> *"Increase recreational value by keeping pace with population growth through additional investments in existing parks, acquisition of additional available land for parks, and the additional new parks and public spaces as part of new private development projects." (p121)*

Based on staff corrections to the D-UCP announced at the UCPG meeting, April 9, 2024, the planned deficit in recreational value is projected to be ~**4,100 points at build out, which represents park facilities for ~41,000 peopl**e

The published (uncorrected) deficit in the Draft UCP is **5,592 points**, park facilities absent for approximately **56,000 people**. (Table 7, p 213).

Several points seem clear:

> The projected **"park points" deficit is a red flag that the Draft-UCP land use scenario is overbuilt**.
>
> **The deficit is driven principally by the scale of proposals for population growth** – rather than by the quantity of recreational values in University City.
>
> Significant efforts to maximize those values have been made since the first draft of the Parks and Recreation element was released in May, 2022 (thank you, planners), but the deficit has not been closed.
> The **deficit is an internal indication** that the **city cannot meet its infrastructure obligations** for the growth proposed in the Draft-UCP – much less in the high-density alternative considered in the D-EIR.

* Part of the solution to meeting park needs for future residents of the University Community is re-scaling our land use scenarios so that they can be serviced.

Recommendation:

> The Final EIR should carefully evaluate the Community Supported Land Use Scenario (Discussion Draft, Appendix) as an alternative.

* Additional solutions are addressed below, including
> - More robust requirements for park space scaled to the size of residential and mix use developments.
>
> - Develop a stronger Funding and Implementation Mechanism for Parks.

2) Recreation and Aquatic Center Deficit

The Draft UCP projects a significant deficit in **Recreation Centers and Aquatic Facilities**.

- The D-UCP projects a **deficit of ~2.2 future Recreation Centers at build out**.[1]

- The D-UCP projects a **deficit of ~.59 Aquatic Complexes.**

In reality, the deficit in these facilities is ***larger than reported***:

- The new **Aquatic Complex at Standley Park** is a *joint use facility* that is *not accessible* to the public during school hours for most of the year.

- The **Recreation and Aquatic Center at the proposed "Torrey Pines Neighborhood Park**," while welcome, ***is contingent*** upon non-renewal of a current lease, which is not up for renewal ***until 2043***.

- Thus the D-UCP offers no potential for improvement in the Recreation and Aquatic Center deficit for ***two decades into the life of the new community plan***.

The **D-UCP is also deficient in reporting and planning for public use of the existing Recreation and Aquatic Center in Mandell Weiss – Eastgate Park** under a lease that requires that these facilities be available to the public.[2]

Recommendations:

The Final UC Plan **should:**

*** Show plans for achieving the *Parks Master Plan* standard for Recreation Centers and Aquatic Facilities in the University Community**.

*** Include plans for additional Recreation and Aquatic Centers** to meet PMP standards.

Add to Table 7, p 206-07,

Recreation Center at Mandell Weiss-Eastgate Park

Aquatic Complex at Mandell Weiss-Eastgate Park

[1] Rec Centers of 17,000 sf each, based on corrected build out population of 129,566 announced at UCPG, Apr 9, 2024. One recreation center of 17,000 sf per 25,000 population (=5.18), minus three existing recreation centers = a deficit of 2.18 recreational centers. UC will be short by .59 Aquatic Centers.

[2] The Lawrence Family Jewish Community Center Recreation Center and Aquatic Complex in North University City is operated under a 1981 lease with the City of San Diego **on city property** designated as Weiss-Eastgate Park. The lease requires that the property "***shall be developed, operated, and maintained as a public community center for park, recreational, cultural, and educational activities for the benefit of the citizens of San Diego***." (Source: https://docs.sandiego.gov/council_reso_ordinance/rao1981/R-254702.pdf). These facilities should be publicly accessible and assessed along with the other Recreational Center facilities as part of the recreational values of the UC Plan Area.

Modify Policy 4.1 F, p. 176. Preserve, expand and enhance existing recreation centers and aquatic facilities to increase their life span ***and meet Park Master Plan guidelines for recreation and aquatic facilities to serve the University Community.***

Add Policy 4.1 F.1, p 176. ***Assure public access to recreation and aquatic centers on city owned sites.***

3) Linear Parks

Thank you for your past attention to the long-standing goal of new Linear Parks in the University Community.

Nonetheless, I am deeply concerned by the city's **diminishing commitment to** this goal, which **threatens community support** for the UC Plan.

While some of the language in the D-UCP holds out the hope for these spaces to be developed ***as PARKS*** (e.g., p. 126 and Table 7, lines 15-16, column 4), the expanding use of the term "**greenways**" to describe Linear Parks **suggests a retreat of city support** for this community goal.

- The **explanation** offered in the ***Engagement Survey***, p 27, is **unsatisfactory**: e.g.

> "*The Regents Road Greenways are facilities located within the public right-of-way. The primary role of public right-of-way is to serve mobility needs. The term "greenway" was selected to recognize* ***the transportation-orientation for these facilities***."

- I believe that this explanation may be **erroneous**. See Discussion below.

- It also appears that this explanation **conflicts with the Parks Master Plan,** which provides specifically for Linear Parks in public ROWs.

> **"Linear Park" is a listed park typology** (PMP, p21-22). "Greenways" is not. Rather, the term appears just twice in the PMP as a subsidiary to a different type of recreational facility - Trails.

Discussion:

> The **two Linear Parks at the north and south ends of Regents Road** were the most referenced feature in public comments collected since the beginning of the process in 2018. They have been a goal of the community stretching back more than a decade, and they represent key outcome of a decades-long struggle that removed the antiquated Regents Road Bridge from the community plan. It was the bridge's removal in the 2016 Community Plan Amendment, confirmed by the Superior Court in 2018, that permitted the UC Plan Update process to begin.

The possibility that these derelict ROWs could become new community parks has been a motivating reason for many residents to support the Plan Update, regardless of their position on the former bridge.

The proposal for **a *third* Linear Park at the west end of Governor Drive** was a creative response by the Planning Department developed from the UCPU process. (Thank you, Katie Witherspoon!)

A consistent goal of the community has been for these spaces to be developed ***as Parks***, **NOT *as merely greener streets* (or in the new terminology, "*greenways*").**

The UCPG and UC Plan Update Subcommittee reinforced this point by making explicit their expectation that these spaces **be designed and managed *as parks* by the Parks and Recreation Department** and NOT by the Dept of Transportation and Stormwater,

This is a meaningful distinction. Parks and Recreation is the city department charged with the design and management of Parks. TSW is a department with different priorities, staff, capacities.

The current state of these ROWs under TSW management gives little support to the idea that TSW will be able to meet community expectations for new parks in these locations.

The plan update process points to the same conclusion. Around 2020, city plans for these spaces changed notably. The originally robust, multi-purpose recreational plans for these spaces created by Parks designers were whittled back to essentially bike trails and bushes.

Staff explained that this was "necessary" because city policy for use of street rights of way *might* preclude the development of these spaces as "parks" in the fullest sense, rather than merely greener street rights of way.

In response, UCPG Chair, Chris Nielsen and I, initiated conversations with the D1 City Council office to learn whether City Policy would permit these spaces to be designed and managed by the Parks and Recreation Department.

In 2022, Councilmember Joe LaCava's office initiated a Legal Services Request to the City Attorney's office.

In Fall, 2022, we were informed that the City Attorney ruled that management of street ROWs by Parks and Recreation ***is admissible under current city policy***.

Based on the information conveyed to us, the City Attorney's office identified two potential pathways, one permanent through Council action, the other "temporary" under authority granted by the Mayor to designate department management for specific areas of city responsibility.

As we have noted before, this is an issue with city-wide implications.

Park-deficient neighborhoods across this city of canyons contain unused, dead-end street rights of way that might be transformed into parks. Surrendering this opportunity in the UC Plan fails the city as a whole.

Recommendations:

- Please refer consistently to these spaces in the D-UCP as "Linear Parks."

- Please delete or reduce references to these features as "Greenways."

- e.g., Please modify language, p. 126:

"These three ~~green-way~~ ***Linear Park*** projects could provide fitness circuit nature exploration playgrounds, educational signage, pedestrian and bike paths for families and children as well as providing scenic overlooks into the canyon while maintaining and improving existing trails and maintenance access. They also provide an excellent opportunity to educate the public on the native plants and animals that need the canyon to thrive and survive."

The ~~greenways~~ ***Linear Parks*** not only add new acres of park space and paths but remove acres of asphalt and dirt, repurposing the area into a more sustainable environment of native plants and trees. The ~~greenways~~ ***parks*** are also envisioned to capture storm water runoff to be treated using nature-based solutions before the water can runoff in the canyon, Implementation of the ~~greenways~~ ***Linear Parks*** will also reduce heat gain, which follows the Climate Action Plan."

- Please adopt Policy language to support the use of street rights of way as Linear Parks.
- e.g., ***4.1xx, p 176***.

Support opportunities to convert undeveloped right-of-way or underutilized paper streets into linear parks.

- Please confirm that these spaces will be designed and managed by the Parks and Recreation Department (not Transportation and Storm Water).

- e.g., **Add policy language** (**section 4.1 xx**, p 176) that they will be developed ***as Parks*** and **managed** as such by the Park and Recreation Department.

Support the design and management of future Linear Parks on Regents Road and Governor Drive by the Parks and Recreation Department.

4) Land Acquisition

The Draft UC Plan does not explain clearly how it will **meet the *Parks Master Plan* (*PMP*) for land acquisition and land area**.

The *PMP*, Appendix D, p. 19 states that "At least 20% (or 20 points per 1,000 residents) of a community's park standard **shall be satisfied through increased land acquisition**."

The PMP indicates that this score as part of total recreational value will be "calculated and used during the community plan update process." (*PMP*, Appendix D, p 19).

The operative word is "**shall**."

The **Draft UCP includes no discussion of how this mandate will be achieved.**

As the second large plan update to approach completion since approval of the *PMP*, the UC Plan should lay out very clearly how the city will meet this mandate. This is an answer the city must have, and the UC Plan is the place to apply it.

Specific Recommendations:

- p. 213, Table 7, Community Summary –

Include a row and calculation of Land Area for future parks

- The UC Plan should explain clearly how this standard will be applied to UC Plan (and to community plan updates in general) and how the plan will meet this standard (Table 7, p 213).

- p 213, Table 7, Community Summary, should clearly state how many acres of land will need to be acquired to meet the city's points standard (and where these are planned).

- My fast math suggests as much as **296 additional new acres** of park space will be required to meet the *PMP* mandate.[3]

4). Clarify Policies for Urban Public Spaces in Residential and Mixed Use projects.

The Draft-UCP includes no clear explanation for how residential and mixed-use projects will meet Recreational Value requirements.

[3] The PMP indicates the need for **370 total acres of park land** in the UC Plan Area at build out (that is, 12,956 points needed x 20% of rec value points at ~7 points per acre). Subtracting the current 74.6 acres of community park (UC Community Atlas, 58) equals approximately *296 additional acres* to meet the PMP standard.

This is confusing and concerning, given that the Discussion Draft included the following clear language:

> e.g., **SDR 1 – k, p 191:** *Recreation Value Points. All new residential or residential mixed-use development shall satisfy Recreation Value Points as part of the development of the urban public space that meet the standards identified in the Parks Master Plan.*

Specific Recommendations:

> **Please restore Discussion Draft language** (above) to ***SDR section A. Public Spaces***.
>
> ***All new residential or residential mixed-use development shall satisfy Recreation Value Points as part of the development of the urban public space that meet the standards identified in the Parks Master Plan.***

5) Neighborhood-Scale Parks

Thank you for recognizing community concerns for planning new Neighborhood Scale Parks.

I encourage you to go further to meet the Recreational needs of future residents.

a. Torrey Pines Neighborhood Park.

I appreciate the creative thinking that has raised the potential for **a Torrey Pines Neighborhood Park.**

While there would be MANY details to work out, the site has great potential. There could be opportunities for park and hospital uses to co-exist on the site, as well as for incorporation of underused adjacent land in Torrey Pines City Park.

Unfortunately, **there are significant limitations to this proposal**, which diminish its value, especially in the context of the massive parks deficit identified in the D-UCP.

> - The proposal is ***contingent*** **on non-renewal of a lease** on a well-used medical facility.
>
> - The **existing lease on the property runs until 2043**.
>
> - Park planning for this site **could not commence until 2043 at the earliest**.
>
> - Thus, the **proposal** would do nothing to address the current or future shortage of neighborhood park space for **at least 20 years into the life of the plan**.
>
> - The impact of the proposed Torrey Pines Neighborhood Park will be limited by its location as there are no current or future residents planned for this area.

The proposal would be ***more valuable*** (and more likely to be achieved) if the UC Plan included future residents in this part of the community.

Specific Recommendations:

- **Reconsider EMX-Flex land use designations** in the North Torrey Pines area to permit development of workforce housing close in this growing job center (which is poorly served by public transit but may be well supplied with a new neighborhood park).

b) Urban Public Space requirements *scaled* to the size of development *for larger* Residential and Mixed Use projects.

The "5 P's" are a creative approach to future public space needs, nonetheless, no one should expect that "parks" of 3,000-5,000 sf will meet the recreation needs of a UC community twice today's size.

Future residents will need new parks large enough to kick a ball, throw a frisbee, or let a three-year-old run with abandon.

I reiterate the request of the UCPG that the UC Plan ensure that Neighborhood Scale Parks are built *where* population grows,

Specific Recommendations:

- **Add a new SDR (A. Public Space)** to require that Residential and Mixed Use projects in the CPIOZ area **meet the PMP requirement for 20 percent of Recreational Value through land area**.

- **Add a new SDR (A. Public Space), providing for large Residential or Mixed Use projects (e.g., premises greater than 300,000 or 400,000 sf) to provide parks scaled to the size of development – approximately 1-3 acres.**

6) Account for Recreational Value Fully and Transparently.

THANK YOU, for reviewing and rescoring our local parks in the Draft UCP (Table 7).

As a result, the Draft-UCP offers **a more accurate basis for evaluating** Parks and Recreation planning in UC than the Discussion Draft.

On the plus side, the review identified **new recreational values** for **existing facilities** that were overlooked in the Discussion Draft and for **new facilities** that are presented for the first time. These include Torrey Pines City Park and Montrose Park (existing) and Torrey Pines Neighborhood Park (new). **Thank you** for these positive steps.

On the minus side, the re-scoring raises new concerns:

- Regretfully, the total of new park/recreational points proposed in the Draft-UCP **is LESS THAN** the points projected in the Discussion Draft**. The D-UCP projects 5,229 points added compared 6,052 points in the Discussion Draft**, a reduction of ~856 points (or parks for 8,500 people).

- The **D-UCP eliminates a whole category of Recreational Value points** projected for **residential and mixed-use developments** on sites under 2 acres (~85,000sf). In the Discussion Draft ~300 points were expected from such developments.

- **The D-UCP's cumulative total for "Proposed Recreational Park Value" may be inaccurate**.

  Note: my fast math suggests a different total (5,196.125) compared to the *Total Recreation Value Points Community-Wide* in Table 7 (5,229.375). The total points added for new park and recreational facilities (lines #6-35) appears to be 1,845.125, added to 3,351 for CPIOZ urban spaces (line #36) = 5,196.125

- **It is unclear that "Build out population" in Table 7, line 36** is accurate and consistent with the projected build out population on page 46.

  Note:
  Build out population for the Plan Area is 129,566 (p 46).
  Subtracting the current population of 60,950 = projected growth of 68,616.

  Table 7, line 36 reads:

  "Build-out population **within CPIOZ** *= 66,980.*
  Points required = (66,416/1000) x 100 =6699 points.
  Anticipated implementation rate = 50%. 6699 points x 50% = 3351 anticipated points"

  - Can you please clarify where the remaining 1,636 residents are expected.
  - If in new residential development, please clarify why these projects will not contribute to future Recreational Value.

- Finally, it appears that **there may still be missing park points** in Table 7.

e.g., Please confirm the existing (and future) recreational value totals for Torrey Pines City Park. Existing points (0) would appear to be an undercount. Please rescore.

Recommendations:

- Please **make recreational value scoring sheets for specific parks publicly available** so that community members can check that work, contribute, and verify.

- Please **be sure that current and projected points are reflected accurately**.

e.g.,
Confirm Total Recreation Value Points Community-Wide (Table 7)
Confirm/clarify "Build out population" in Table 7, line 36

- **Incorporate Specific Recommendations for Park and Recreation Facilities** in section 9 below.

-**Please add SDR in section A to clarify how new residential developments will satisfy the requirement for recreational values**. (see Section 4 above)

- Restore SDR (section A) providing for future Recreational Values from residential and mixed use developments under 2 acres.

7). Funding and Implementation Mechanism for Parks

I appreciate the creative effort to design **SDRs-A1-5** for Urban Public Spaces; however, even with this effort, the Draft-UCP does not come close to meeting the required recreational values mandated by the *Parks Master Plan*.

It does meet the land acquisition mandate.

It does meet the requirement for Recreation Centers.

It does not meet the Parks Master Plan guidelines for recreational values, and it does not meet its own stated goal to

> *"Increase recreational value **by keeping pace with population growth** through additional investments in existing parks, acquisition of additional available land for parks, and the additional new parks and public spaces as part of new private development projects." (p121)*

Please consider additional strategies to build and finance future park and recreation infrastructure.

Specific Recommendations:

- Consider a **supplemental funding mechanism** such as Supplemental Development Impact fees ("Future Opportunities Fund") for Parks in UC (see section X below).
- Consider a **revised or expanded SDR-A##** to **scale park facilities to the size of residential or mixed-use development** with the goal of providing parks of 1-3 acres in large new developments above a threshold size (perhaps 300-400,000sf). See section 5) above.
- Consider **other means to finance and support park development** to meet *PMP* standards.

8). Specific Comments related to text, D-UCP, pps 21 and pps 120-33

Changes/additions to language of the **Draft University Community Plan** are marked using ***underlined, bold (green) text with italics.***

Language in orange reflects language adopted from recommendations on the Discussion Draft.

p. 21 **Correction**: ~~Two~~ ***Three*** linear parks along Regents Road and Governor Drive will offer new overlook areas to enjoy scenic canyon views.

p 121: **Thank you** for adopting the recommendation of the UCPG (July, 2023):

- Protect, preserve, and restore natural areas and sensitive biological resources.

p 122: **Thank you** for adopting the recommendation of the UCPG (July, 2023):

> A large portion of the open space in the community has regional significance and attraction. The Torrey Pines mesa and coastal areas contain the Torrey Pines State Reserve and the Torrey Pines City Park and Golf Course. The beach, cliffs, native vegetation, and scenic views of the Pacific Ocean make these a one-of-a-kind City resource. The community's open space lands also form a critical part of the City's Multiple Habitat Planning Area (MHPA), including protected habitat and wildlife corridors for sensitive species.

p 126: **Linear Parks**

> **See discussion in section 3) Linear Parks, above.**
>
> **- Please modify language, p. 126:**
>
> "These three ~~green way~~ ***Linear Park*** projects could provide fitness circuit nature exploration playgrounds, educational signage, pedestrian and bike paths for families and children as well as providing scenic overlooks into the canyon while maintaining and improving existing trails and maintenance access. They also provide an excellent opportunity to educate the public on the native plants and animals that need the canyon to thrive and survive."
>
> The ~~greenways~~ ***Linear Parks*** not only add new acres of park space and paths but remove acres of asphalt and dirt, repurposing the area into a more sustainable environment of native plants and trees. The ~~greenways~~ ***parks*** are also envisioned to capture storm water runoff to be treated using nature- based solutions before the water can runoff in the canyon, Implementation of the ~~greenways~~ ***Linear Parks*** will also reduce heat gain, which follows the Climate Action Plan.

p. 132 Privately owned parks and rec spaces…

> *Private associations, in many cases, maintain private parks, playgrounds, open space, and private trail, such as at the Genesee Highlands Park and La Jolla Colony. However, most open space areas, natural canyons, and natural slopes are maintained by the City of San Diego. Within these areas are designated open space through the MHPA, as well as adjacent areas that are not deemed sensitive that could provide active and passive recreation. Trail systems, parks and pedestrian connections could be upgraded for public use; however, no development is allowed in the MHPA.*

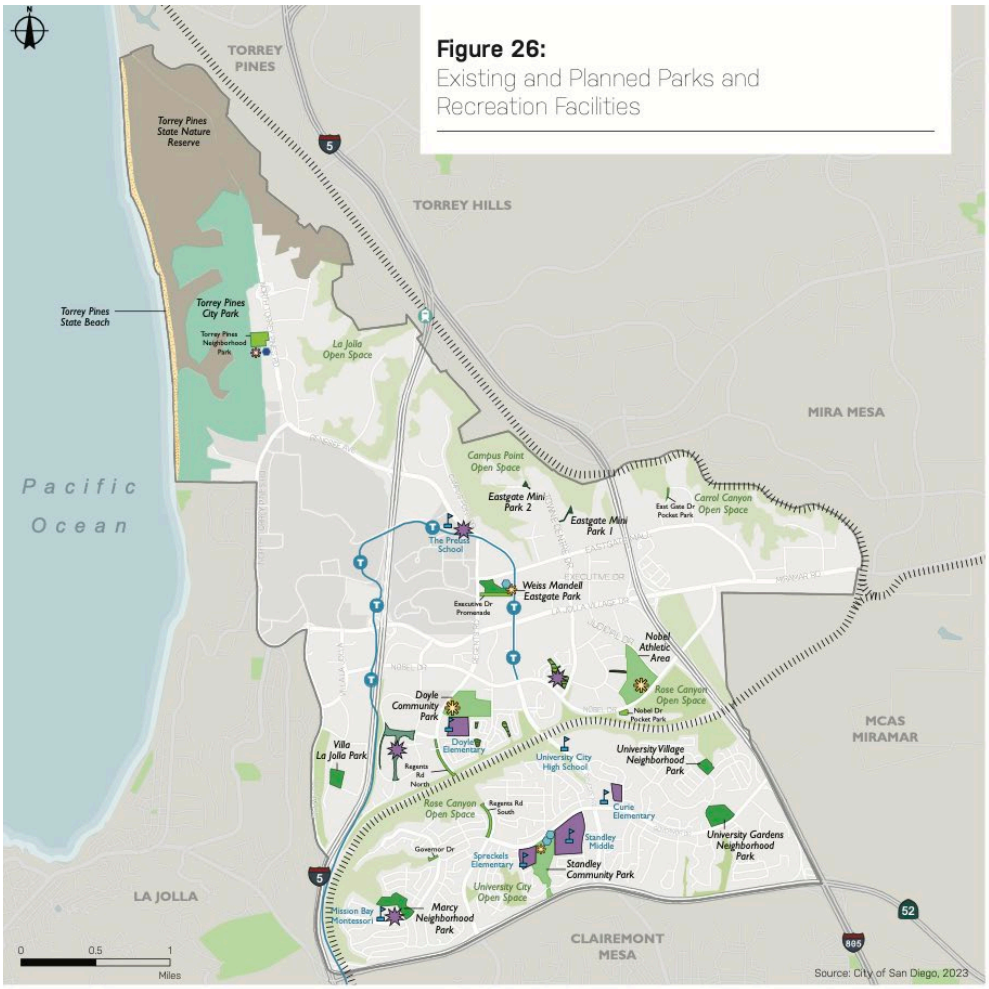
Thank you for the added language, which clarifies restrictions on uses of MHPA lands.

UCPG meeting, 4/9/24.

- **Thank you** for the public announcement that the Recreational Value tallies on p 133, would be updated to reflect the accurate population projected at build out (shown on p 46). I look forward to seeing these in print.

8) Assure Consistency between Figure 29, Table 7 and Graphic, p 133

p. 125 – **Figure 26: Existing and Planned Parks and Recreation Facilities**



Updates/Corrections:

- Be sure Figure 26 refers correctly to "***Mandell Weiss"*** Eastgate Park.

- **Thank you** for including the **Aquatic Center** (current) and **Recreation Center** (future) in Weiss Park in Figure 26.

- Please show proposed **Executive Drive Promenade** extending east of Genesee Ave.

- **Thank you** for including potential joint use facility with **Preuss School**.

- Please **delete Eastgate Drive** pocket park. (see section 10 below).

- Please **consistently identify** Regents and Governor Drive parks as "**Linear Parks.**" (see section 3 above)

B) Please assure consistency between the facilities ***listed*** in Figure 26, those ***enumerated*** in the graphic on page 133 and those ***described*** in Table 7.

- **Assure consistency:** La Jolla Colony Park.
  Figure 26 shows joint use facilities at LJ Colony Park.
  Table 7, p. 210, does not list these facilities.

- **Assure consistency:**
  Please add proposed **Campus Point** and **Torreyana** pocket parks to Figure 26.
  These are listed in Table 7, numbers 22-24, p 210.

- **Correct/confirm accuracy of graphic on p. 133**
  "New and Improved Park and Recreation Facilities,"

  * *"Recreation centers: "2 new, ~~2~~ **3 (three)** improved."*

  Please Re-tally and correct "Recreation Centers":
  Table 7 lists **three existing rec centers**: Standley, Nobel, Doyle
  Figure 26 shows **one new rec center**: Torrey Pines/Scripps
  Table 7 does NOT show the recreation center in Weiss Park,
  Figure 26 shows **one existing or future Recreation Center** at Weiss Park

  * *"Aquatic centers: 2 new and 2 improved"*

  Please Retally and Correct Aquatic Complexes: is it 1 and 3?
  Table 7 lists **two** existing aquatic centers: Swanson and Standley
  One existing Complex (Weiss Park) appears on Figure 26, but it does not appear in Table 7
  Figure 26 identifies **one new** opportunity at proposed Torrey Pines park.

  * *"Neighborhood parks: 1 new, 5 improved"*
  Tally appears correct.
  Table 7 lists the five (Marcy, UC Gardens, UC Village, Villa La Jolla, Mandell Weiss) plus one new, Torrey Pines-Scripps

  CONSIDER opportunity at defunct Golf Course property in SE UC?

** Miniparks, pocket parks and promenades: 8 new, 3 improved*

- Confirm numbers:
  Table 7 shows 6? Regents No/So, Govn, Exec Promenade, Nobel [private property], East Gate Dr [private property].
- Add Torreyana and Campus Point Pocket Parks to FIG 26
- Consider adding the extended Eastgate Mini Park 2 (see section 10 below)

** Joint Use facilities: 2 new, 5 improved*

- Retally and assure consistency:
- Text, p 132 lists 4 current joint use today – Standley, Spreckels, Curie, Doyle
- Table 7 lists 7 joint use facilities
- Confirm #: Fig 26, p 125 shows 4 new: Marcy, Preuss, UTC/Montrose, LJ Colony

9) Specific Park Recommendations: RE Table 7: Park Inventory

Table 7: pps 208-13

Correct numbering: Row 4 and "5." Note, there are two rows numbered 4.

p. 208, #4-6

Please include plans for Recreation and Aquatic Centers to meet PMP standards.

Specific Recommendations:

a. Please account for the existing Aquatic and Recreation facilities in Weiss Park, which are operated by the Lawrence Family JCC.

b. **Clarify that the intent of the UC Plan is that the *public* park facilities at Weiss Park/Lawrence Family JCC should be *publicly accessible*.**

If they are not public today, the plan should make clear that is the community's goal that these be publicly accessible park and rec "opportunities" in the future,

In this way, the situation could be analogous to the future opportunity for the Torrey Pines Neighborhood Park.

- These facilities should be scored in the plan either as *existing* or *future* recreational and aquatic facilities.

- #13 Mandell Weiss Eastgate Neighborhood Park **- p. 208 -**

- Confirm the status of the *public* park facilities at Weiss Park/Lawrence Family JCC

- Clarify the intention that Weiss Park/JCC facilities are public – as the controlling agreements indicate. (See section 2 above. Note also the 1987 UC Plan includes Eastgate Park among population-based parks, ***"as a privately operated park and community recreation center open to the general public"*** 229.

- Bring "Recommendations" into consistency with the other instance of privately leased city land at Torrey Pines Neighborhood Park. (Note**,** the lease will expire before the term of the Community Plan).

Thank you for re-scoring Mandell Weiss Park

Please rescore again ("Existing Park Value") ***including* JCC facilities**. Facilities listed in website include recreation center, fitness gym, tennis center and courts, theater, and aquatic center.

Please revise future recommendations (column 4) to remove redundancy. Note: The Draft recommendations include *outdoor amphitheater*. JCC website lists: "an *outdoor amphitheater*"

- **Please update the acreage** to **10.49 acres** in column 6, "Existing Size"

- Limit hardscape and development in open areas of Weiss Park. The open outdoor area of Weiss Park is very well used. It is crowded with limited Space for play fields.

- Add policy 4.1 F1

"Assure public access to recreation and aquatic center facilities of the Lawrence Family JCC in Weiss Eastgate Park."

- Consider adding the **recommendation to explore potential for expanding Weiss Park in the future** through purchase or agreement with adjoining property owners. Note: utility property at NE corner of Regents Rd/Executive Dr. may not be needed for present purposes in the future. It would represent an opportunity for the city to expand park space in a critical location.

#14. Torrey Pines Neighborhood Park:

Thank you for the creative thinking that has raised this opportunity for a potential future Neighborhood Park in North University City.

- p. 208 – Future Neighborhood Park Opportunities

- Consider future park potential at: **Town Park Villas Golf Course**:

  Consider potential for a future **Neighborhood Park** at the former golf course through acquisition or joint use agreement. Vet with community.

- Consider future park potential at **La Jolla Village Square/Nobel Campus Area**:

  Consider recommendation for a Neighborhood Scale Park at/in vicinity of La Jolla Village Square.

  Planning for redevelopment on this site (which will require a vote of the city) should include plans for a Neighborhood Scale Park. Let's plan now for a concept including affordable housing, park and community serving retail that can win city-wide approval of the voters.

#15-16 – Linear Parks at Regents Road North/South, p 208

- Thank you for your support for Linear Parks. Please maintain this support.

- Please modify language, p 208 to identify them as such:
  "Regents Road ~~greenway~~ ***Linear Park*** North" and
  "Regents Road ~~greenway~~ ***Linear Park*** South

- Please use the term "Linear Parks" (versus "greenway") to **match *Parks Master Plan* Parks Typology** (e.g., PMP, Table 3, p 21-22).

The terminology is significant because the Parks Master Plan has a typology for Linear Parks, which these spaces meet. The term "greenway" only appears in the *PMP* as a subsidiary concept underneath Trails facilities.

- Please **state intention that these spaces will be designed and managed by Parks and Recreation Department** (and not Transportation and Storm Water).

- See section 3), please **Add policy language** that they will be developed ***as Parks*** and **managed** as such by the Parks and Recreation Department.

- Note, this transfer of management is permissable for city street ROWs, per City Attorney, and may be accomplished by Mayoral or Council action.

- This step should be included as part of the approval and adoption of the UC Plan.

#19 Eastgate Mini-Park 2, p 210

- Update description of facilities to reflect current conditions.
There are no picnic tables. The "multi-use path" comprises two disconnected sidewalk fragments.

- Include in "Recommendations" concepts presented to UCPU Subcommittee, May 17, 2022, including elevated walkway, interpretive educational signage, potential vernal pool restoration, and outdoor education space at Mini-Park 2.

Plan for larger size.

- **Explore potential joint use agreement** with private owner of adjoining former building pad, which contains a natural vernal pool and tremendous potential for restoration, education, and stewardship.

(Source: Planning Department Presentation, CPUS Meeting, May 17, 2022)

 # 20: Governor Drive ***Linear*** Park, p 210
- Revise language:

- Identify as a "Linear Park"
- Strike reference to "greenway"
- Clarify location ("south of Rose Cyn" includes 1/3 of UC)
- Confirm intention for management by Parks and Recreation Dept.

- Please **Update description for accuracy**:

"Existing right~~s~~-of-way ***at the west end of Governor Drive*** ~~south of the Rose Canyon~~ is planned to be converted into a ***Linear*** pocket park ***under management by Parks and Recreation Department between Stresemann Street and*** ~~at~~ the entrance to the Coastal Sage Habitat Interpretive trail.

#21: - Eastgate Drive Pocket Park, p 210:

- **Please Delete this proposal for a joint use park.**

- The area is maintained privately as a small "park." Principally, it appears to be used for illegal dumping.

- The location is inside the **Airport Noise Exposure 65 decibel zone**.
(see Community Atlas)

- **Passive recreation is NOT a permitted use in the 65+ decibel zone**.[i]

- The area is not appropriate for a pocket park (passive recreation).

- The city should not take on maintenance and costs of this space.

p. 210, Please restore: **Gullstrand St. Trailhead Pocket Park**

- There is strong community support for acquiring this 14-acre parcel **as open space.** Multiple community group votes have supported this position. The UCPG voted 16-0 in July 2020, to recommend protection of this parcel *as open space*. (see UCPG Minutes, July 2020).

Clarify that the 14 acres would remain an **open space park** with a new trailhead, pocket park at Gullstrand Street.

-Specify potential for acquisition through **purchase or land swap** – which Public Utilities Department may have greater interest in and the city may be better able to afford.

Restore description: #22, column 4.

"Recommend acquiring 14 acres of ~~vacant~~ open space north of University Gardens Neighborhood Park from the Public Utilities Department ***(through purchase, land exchange or other means)*** for use as ***open space*** park. Design, and construct **a pocket park c**onsisting of a trailhead, ***trail***, public art, educational/cultural elements, and seating."

p. 210, Please restore Eastgate Mall Trailhead Pocket Park:

This was a good idea.

p. 210 - #28 - Montrose Park – UTC

- Thank you for researching and rescoring #28 Montrose Park – UTC

It is an existing privately owned and maintained park open to the public per previous agreement with the owner.

- p. 210, #29. Joint Use –Mission Bay Montessori.

- Please Delete recommendation for sports field lighting as this property adjoins the MHPA and a steep, unlighted canyon visible from I-5, etc. Avoid light pollution and habitat impacts.

e.g.,
In coordination with the San Diego Unified School District and Mission Bay Montessori, design and construct park facilities consisting of sports field ~~***lighting,***~~ *and all-weather shade pavilion with seating.*

- Preferred description recommendation:

"Work with the community to determine items needed and desired to be added to the park. Include on that list for consideration items on the city's Parks Unfunded Improvements list."

p. 210 – Please Consider Additional Joint Use Opportunities:

- **Consider possible joint use opportunities** in **North UC** where the majority of residential development is planned and the greatest need is/will be.

- **Explore potential for private/public partnerships** for joint use with
  - LJ Country Day School and
  - Religious institutions – e.g., Good Samaritan Church, Temple Beth Israel.

#32 Rose Canyon Open Space Park, p. 212

- **Thank you** for including reference to MSCP/MHPA guidelines.

- Please follow these guidelines further. Natural Resources Management Planning must precede recreational planning in MSCP/MHPA areas. The city is 25 years behind in this legal obligation:

- Please **revise recommendation**:
"Complete a Natural Resources Management Plan to inform future uses.

[i] See San Diego Municipal Code, chapter 13, Table 132-15D, Noise Compatibility Criteria for MCAS Miramar, Brown Field Municipal Airport, Montgomery-Gibbs Executive Airport, and NOLF Imperial Beach Airport Influence Area.

April 26, 2024

Ms. Heidi Vonblum
City of San Diego Planning Department
202 C Street, M.S. 413
San Diego, CA 92101

RE: Canyon Park Property 9545-9705 Genesee Ave
Approximately 8.44 Acres

Dear Ms. Vonblum:

In this letter we would like to register our support again for the land use designation proposed in the current draft of the University Community Plan Update (CPU). We also would like to express our support for the zoning that was released along with this current draft of the CPU. We believe the land use designation for our property as Urban Village (0-218 du/ac) and the zone for our property as RMX-3 is suitable. We continue to hold the position that high-density housing is appropriate at this location due to its proximity to public transit, employment uses, and educational opportunities. The proposed land use designation and zone would allow for such a development on this important site.

We also support the current CPIOZ Supplemental Development Regulations (SDR) for building transitions on properties adjacent to open space. The current draft of the CPU includes "SDR-C.2 for Building Transition – Open Space" which requires a 65-degree angle transition plane at 30 feet above the finished grade and requires a 20-foot setback from the property line. When compared to the SDR in the Community Discussion Draft of the CPU, the current draft of the CPU allows for a greater development potential on this critical site where high-density housing is appropriate. The proposed 20-foot setback requirement in the SDR-C.2 allows the site to be designed with buildings to provide the high-density housing that is suitable for this transportation priority site. It should be emphasized that this site is within a Transit Oriented Development area, consistent with the CPU Priority #2; it is also within a Transportation Priority Area for being within a 1/2-mile walkshed of two major transit stops, i.e., two MTS Blue Line trolley stations. Please clarify the language in the 4th subsection of SDR-C.2 to add that "The height of the transition plane shall not exceed 95 feet above the finished grade **and the building may extend upward above 95 feet outside of the 45-foot setback and the 65-degree transition plane."**

One requested revision is in the current draft of the CPU in SDR-C.2 (on p. 195), there is a reference to Figure 42, but that presumably is referring to Figure 36: Transition Standards. We respectfully request that you please correct this reference.

For any communications related to APNs 343-140-211-00 and 343-140-22-00, please ensure those communications are mailed to:

Canyon Park Apartments, LP
2922 Nichols Street
San Diego, CA 92106

Thank you for considering these comments. Should you have any questions, please contact me at erinwalsh@walshchacon.com or 858-692-0738.

Respectfully,

Canyon Park Apartments, LP
A California Limited Partnership
BY: CP Apartments GP, Inc
A California corporation
Its General Partner

BY:
Erin Malone Walsh, President

Attachments:

University CPU Comment Letter from Canyon Park Apartments, LP, dated April 28, 2023

University CPU Comment Letter from Canyon Park Apartments, LP, dated May 5, 2022

April 28, 2023

Ms. Nancy Graham
City of San Diego Planning Department
9485 Aero Drive, M.S. 413
San Diego, CA 92123

RE: Canyon Park Property 9545-9705 Genesee Ave
Approximately 8.44 Acres

Dear Ms. Graham:

In this letter we would like to register our support for the land use designation proposed in the University Community Plan Update Discussion Draft. We believe the land use designation for our property as Urban Village (0-218 du/ac) is suitable.

As we stated in previous letters, our position is that high-density housing is appropriate at this location. The site remains a critical location for high-density housing because it is close to three MTS trolley stations: UCSD Health La Jolla, Executive Dr and UTC Transit Center. Further, MTS bus service runs the entire length of the property. The City of San Diego should prioritize high-density housing near the transit stations, along with sites near the employment and educational opportunities that exist at UCSD, UTC and the Torrey Pines research area. Because our property is an 8.44-acre site, it is cost efficient to develop high density housing on such a large parcel of land.

We would also like to comment on the CPIOZ Supplemental Development Regulations. The proposed draft community plan shows our site within the Canyon-Adjacent Development portion of the CPIOZ-A (see SDR-21 on p. 201), however, our site is located within two Transportation Priority Areas, a location where high-density housing is needed. The proposed SDRs would limit development potential of the site. We would like to request that this project not be included in the CPIOZ because Canyon-Adjacent development regulations should not apply to our site given its proximity to public transit.

Currently, there is an existing Open Space Easement recorded on the property to protect the canyon, therefore we believe the CIPOZ – SDR's, as proposed, are unnecessary. In the event you do choose to implement the CPIOZ as indicated in your draft plan, we encourage you modify SDR-21(a) to apply this requirement to parcels that have 50% or more of their property 300' or more from the street. The proposed 50-foot setback requirement in the CPIOZ SDRs would require the site to be designed with taller buildings to provide the high-density housing that is suitable for this transportation priority site.

Finally, we believe the affordability requirements for a new project on this site should mirror the percentage required for alternative new construction projects in the City of San Diego. Any

increase in required affordable housing will result in a probability that a new project will not make economic sense and most likely not be built. This would be a shame.

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2922 Nichols Street
San Diego, CA 92106

Thank you for considering these comments. Should you have any questions, please contact me at erinwalsh@walshchacon.com or 858-692-0738.

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May 5, 2022

Ms. Nancy Graham
City of San Diego Planning Department
9485 Aero Drive, M.S. 413
San Diego, CA 92123

RE: Canyon Park Property 9545-9705 Genesee Ave
Approximately 8.44 Acres

Dear Ms. Nancy Graham:

This correspondence serves to comment on the University Community Plan Update (CPU). I am the property owner of the Canyon Park Apartments (Canyon Park Apartments, LP) at 9545 - 9705 Genesee Ave. We appreciate the opportunity to provide input on the CPU and we will continue to engage in the CPU process and support the City's CPU efforts.

We understand that the University CPU Land Use Scenario 1 lists the land use designation for this site as Urban Village (0-218 du/ac). We are supportive of that proposed land use designation and agree that the allowed density on the site should at least be 218 du/ac.

We would also like to express our support for the RMX-3 zone for this site. The residential density and land uses allowed by the RMX-3 zone would be appropriate for this location which is located in a TPA between two trolley stations on Genesee Avenue, the UCSD Health La Jolla and the UTC Transit Center. Bus service is also available adjacent to the property.

We would also support a land use designation that allows for greater density if one were to be formed as a part of this University CPU process. If a zone were to be formed which allows for greater density, then we would support the application of the zone to this site. This is a critical location for high-density housing given the site's proximity to public transit, the UC San Diego campus, and the myriad employment opportunities within the University Community Plan Area.

We are requesting this under the assumption that there is no overlay zone added to this site. If an overlay zone or overlay zones are added to the site, we reserve the right to revise this land use designation and zone request.

For communications related to APNS 343-140-21-00 and 343-140-22-00, please ensure those communications are mailed to:

Canyon Park Apartments, LP
581 San Antonio Avenue
San Diego, CA, 92106

Thank you for considering these comments. Should you have any questions, please contact me at erinwalsh@walshchacon.com or 858-692-0738.

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Erin Malone Walsh, President

RE: Summary of Errors in Biology Report, Figures 4 and 5, regarding Open Space Parcels proposed for Dedication pursuant to Section 55

April 25, 2024

Hi Suchi, Nathan, Coby, and team,

Unfortunately, there is a significant error in the EIR documents regarding the Open Space parcels proposed for dedication.

I noticed last night that the **Biology Report mis-identifies (and omits)** a portion of one of the agreed-upon parcels.

Fortunately, the Draft Plan itself has the proposed parcels correctly identified. **Figure 29 of the D-UCP is accurate** (Thank you planners!).

However, **Figures 4 and 5 of the Biology Report**, which identify the parcels proposed for Dedication pursuant to Charter section 55, **are in error**.

On a related note, it may be that this mistake is also the source of the error in the Zoning map, which we discussed earlier this week.

This raises the concern that all of the documents on the EIR side of things may reproduce that same error.

I have attached a set of Figures for your review and comparison.

Can you **please correct the mistakes in Figures 4-5 and confirm with us** that the parcels proposed for dedication are correctly identified in the place where the information will be translated into policy/ordinance for Council approval?

Thank you, as always, for your careful attention.

Very best regards,

Andy

Figure 29, Draft University Community Plan

Figure 29:
University Community Open Space

Figure 29 accurately represents the parcels proposed for dedication under Charter sect 55.

The parcel that is misrepresented in Figures 4 and 5 of the Biology Report is circled in red.

Figure 4. Post-Project MHPA and Conserved Lands

BIOLOGICAL RESOURCES REPORT, UCP Update.

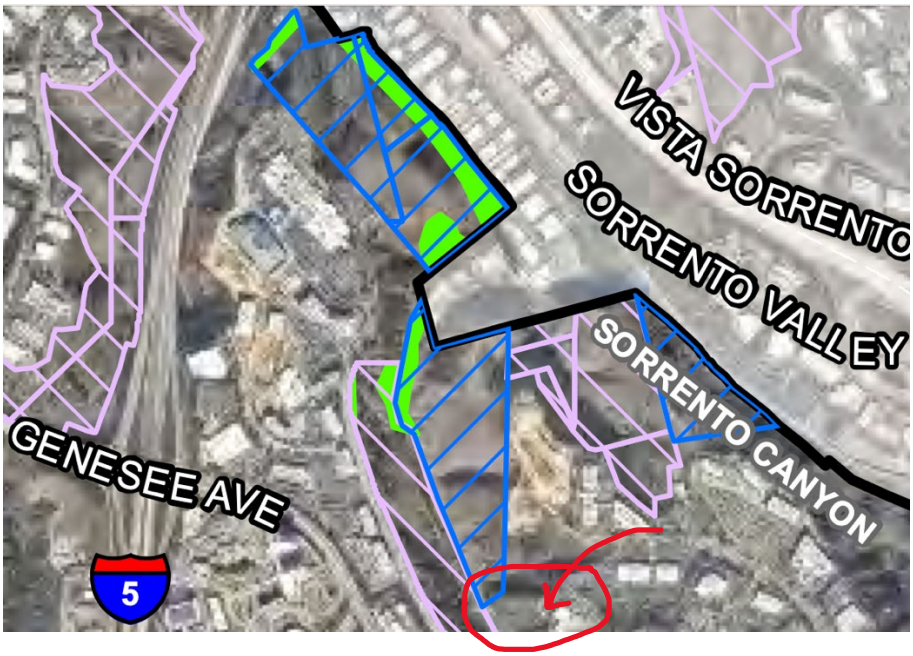


Figure 5: "Open Space to be Dedicated Pursuant to Charter 55"

Discussion:

- Figures 4 and 5 **do not accurately represent one of the four open space parcels proposed for** Dedication pursuant to Charter section 55.

- Specifically, Figures 4 and 5 **do not show all of the parcel K302 P3.** See City Owned Property Map below.

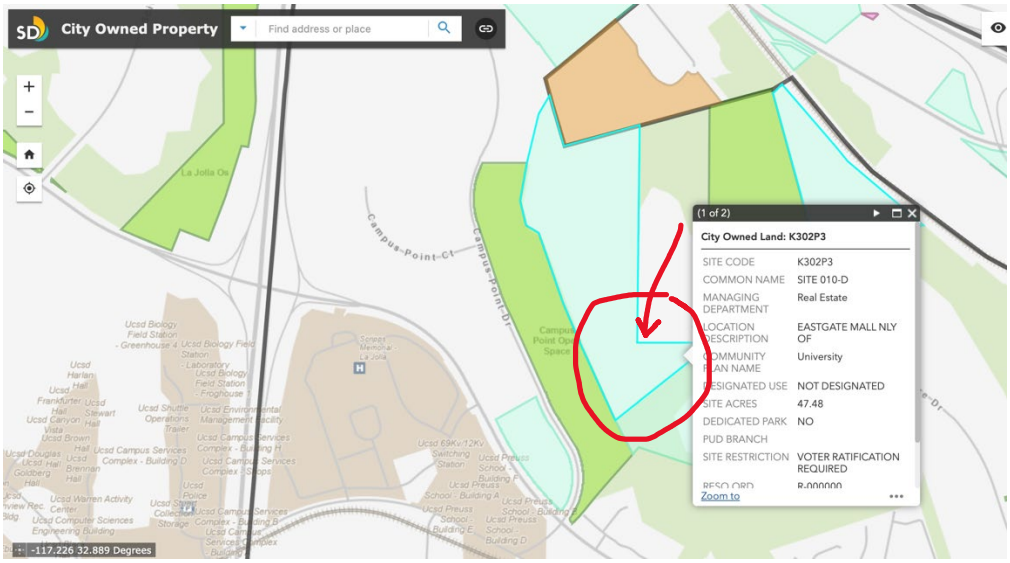
- Figures 4 and 5 are **inconsistent with the Draft University Community Plan**, **Figure 29** (see Fig 29 above).

- For further reference, Figures 4 and 5 are inconsistent with the directions of Planning Director Heidi Vonblum, who identified the four parcels to be Dedicated pursuant to Charter section 55 in communication Jun 11, 2020. (See below). This list includes super parcel **K302 P3**, comprised of numbered parcels, **APN: 343-121-01 & 343-121-05.**

- APN 343-121-05 is missing from Figures 4 and 5.

For reference:

Map of City Owned Property
https://www.arcgis.com/apps/webappviewer/index.html?id=7cace2f50ec7459e84acaa98345c2806



Email from Deputy Director Vonblum, Jun 11, 2020:

Vonblum, Heidi Fri, Jun 11, 4:43 PM

to Chris, rosecanyon@san.rr.com, me, Kristen, Daniel, Katie, Tait, Martin

Good Afternoon Andy, Debby, and Chris,

I wanted to provide a status update for you regarding the potential to dedicate city-owned properties which we have discussed in previous meetings. Planning staff has had previous discussions with Real Estate Assets Department (READ) and has recently held meetings with both Public Utilities Department (PUD) and Parks & Recreation Department staff regarding potential dedication. The list of properties below are those that Park and Recreation Department have agreed to accept full management responsibility. Therefore, we are supportive of dedication in accordance with Charter Section 55 as part of the UPCU process. These properties would also be fully *designated* Open Space and included as 100% conserved MHPA as part of the UCPU.

1) L310RU – Nobel 'Bowtie,' (9.3 ac, mgd by Parks and Rec) – APN: 345-221-17, 345-221-10
2) L303RU-PM - Nobel Hill, (70 ac, mgd by Parks and Rec/REA) – APN: 345-011-24, 348-020-52 (Note 345-011-24 is part of the larger parcel which includes Nobel Athletic Center and Fire Station 50)
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4) **K302P3** - Roselle Canyon - Towne Centre Drive Headlands (48 ac, REA) – **APN: 343-121-01 & -05**

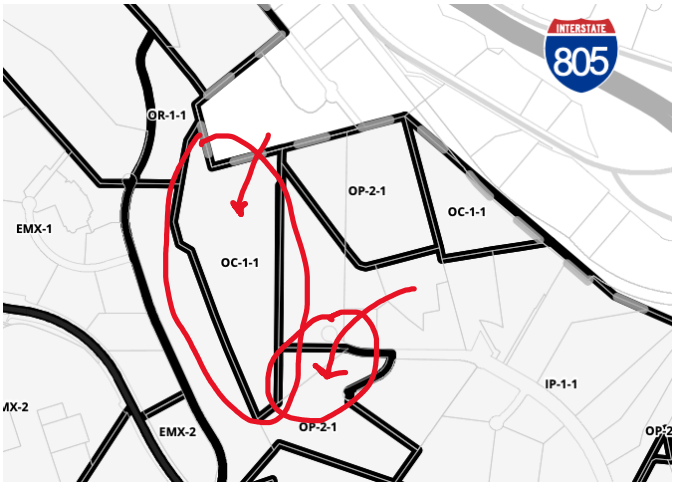
Regarding the Regents Road ROW "shadow" area, we are confirming whether the on-ground area below the "shadow" was previously dedicated. If confirmed, no further action to dedicate this portion would be required. The "shadow" is currently within the MHPA. Concurrent actions with the adoption of the UCPU for this area would then include a ROW easement vacation as well as converting the conservation status within the MHPA from 75% to 100% as part of the accompanying, comprehensive MHPA Boundary Line Correction. If not currently dedicated, formal dedication of this area would be included with the properties listed above and include the ROW easement vacation and MHPA BLC conservation status revision from 75% to 100%. Again, we will keep you updated as we confirm the status of this parcel.

If you have any questions, or would like a follow-up meeting please let me know. Thank you for your patience during this process as we work together on these important items!

Heidi Vonblum
Deputy Director | Environmental Policy + Public Spaces
City of San Diego | Planning Department

VonblumH@sandiego.gov | 619.446.5363

On a related note, the "Proposed Zoning Map" appears to reproduce this same mistake in the identifying different zones (OC 1-1 and OP2-1) for the two pieces of K302 P3, APN **343-121-01 and 343-121-05.**



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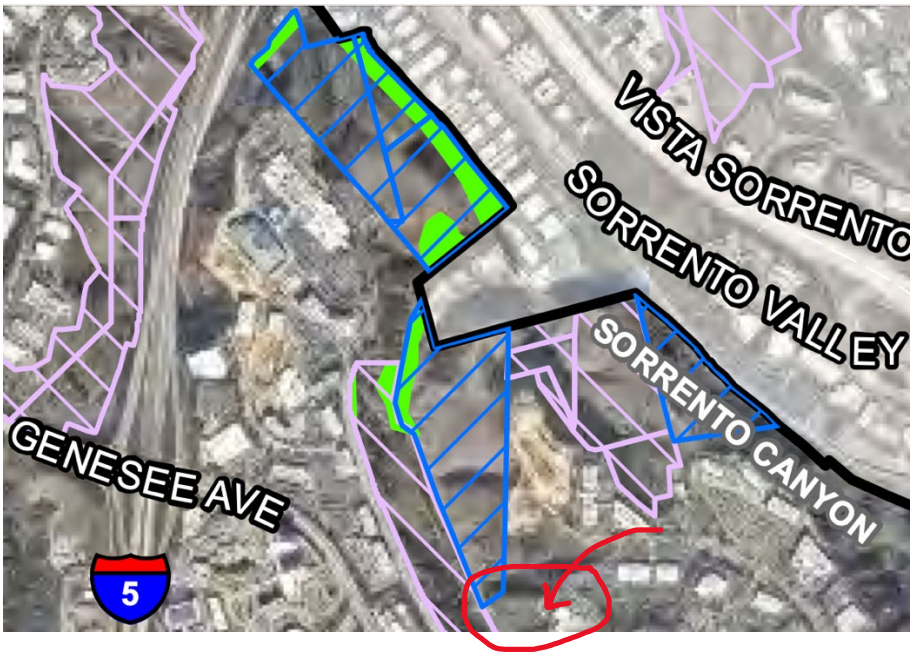

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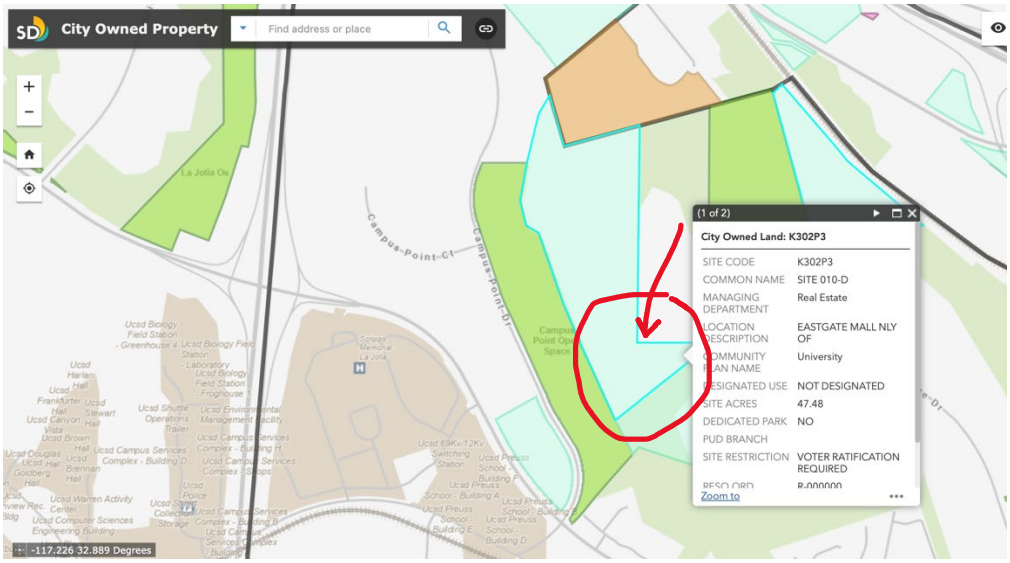

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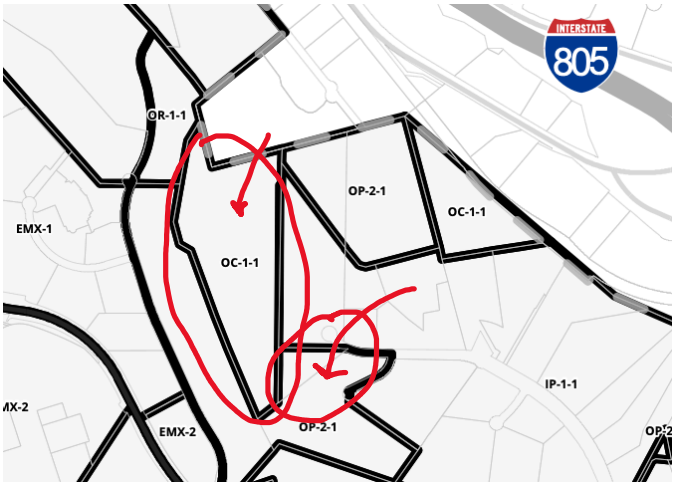

April 25, 2024

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." (Policy2.5A.) "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]

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[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. <u>The environmental analysis for Air Quality is inadequate.</u>

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 pubic 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 50,0000 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. <u>The environmental analysis for Greenhouse Gas Emissions is inadequate.</u>

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 <u>not</u> 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 "<u>Support</u> opportunities to enhance amenities with and around transit stations . . ." and "<u>Support and encourage</u> collaboration between business and UC San Diego to incorporate [transit] . . . ." (Underline added.) Policies 3.5I and 3.5J state the Plan Update will "<u>Promote</u> public education [about transit] . . ." and "<u>Prioritize</u> transit connections . . . ." Policy 3.7A "<u>Encourage[s]</u>

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 gras 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 altneratives 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, one 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 altneratives 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 its 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 altneratives analysis.

J. <u>The City's environmental analysis of Wildfire impacts is inadequate.</u>

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

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or greenhouse gas emissions), the fact that the issue has been raised under a heading for a certain area (transportation) does not limit the objection to the EIR to such a specific area.

impacts on such routes might be by more than doubling the population in the area, or reducing Governor Drive to one lane. Failure to include such analysis renders the City's evaluation of wildfire impacts inadequate.

3. <u>The City's Conclusion that there will be no adverse impacts to Population or Housing is incorrect.</u>

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. <u>The City's analysis of Growth Inducement is incorrect.</u>

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 pubic 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 Hilcrest 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. <u>The City's failure to designate an environmentally superior alternative for Blueprint SD renders the EIR inadequate for Blueprint SD.</u>

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
Linda Bernstein
Paul Goldstein
Pablo Lanatta
Jennifer Martin-Roff
Nancy Powell
Thomas Pushpathadam
Suzy Shamsky

cc: Mayor Todd Gloria
Councilmember Joe LaCava
Councilmember Kent Lee
Suchi Lukes
Chris Nielsen
Andy Wiese

April 25, 2024

RE: Urban Design Comments, Revised Draft – University Community Plan, March, 2024

Andrew Wiese,
Chair, UC Plan Update Subcommittee, UCPG

Dear Suchi, Nathan and Coby,

Thank you to you for revisions to the Urban Design Element of the Discussion Draft of the University Community Plan.

I wanted to take this opportunity to provide additional feedback, to recognize progress as well as to encourage additional improvements in the Final UC Plan.

I look forward to working with you and the community on implementing these suggestions.

Please let me know if you have any questions.

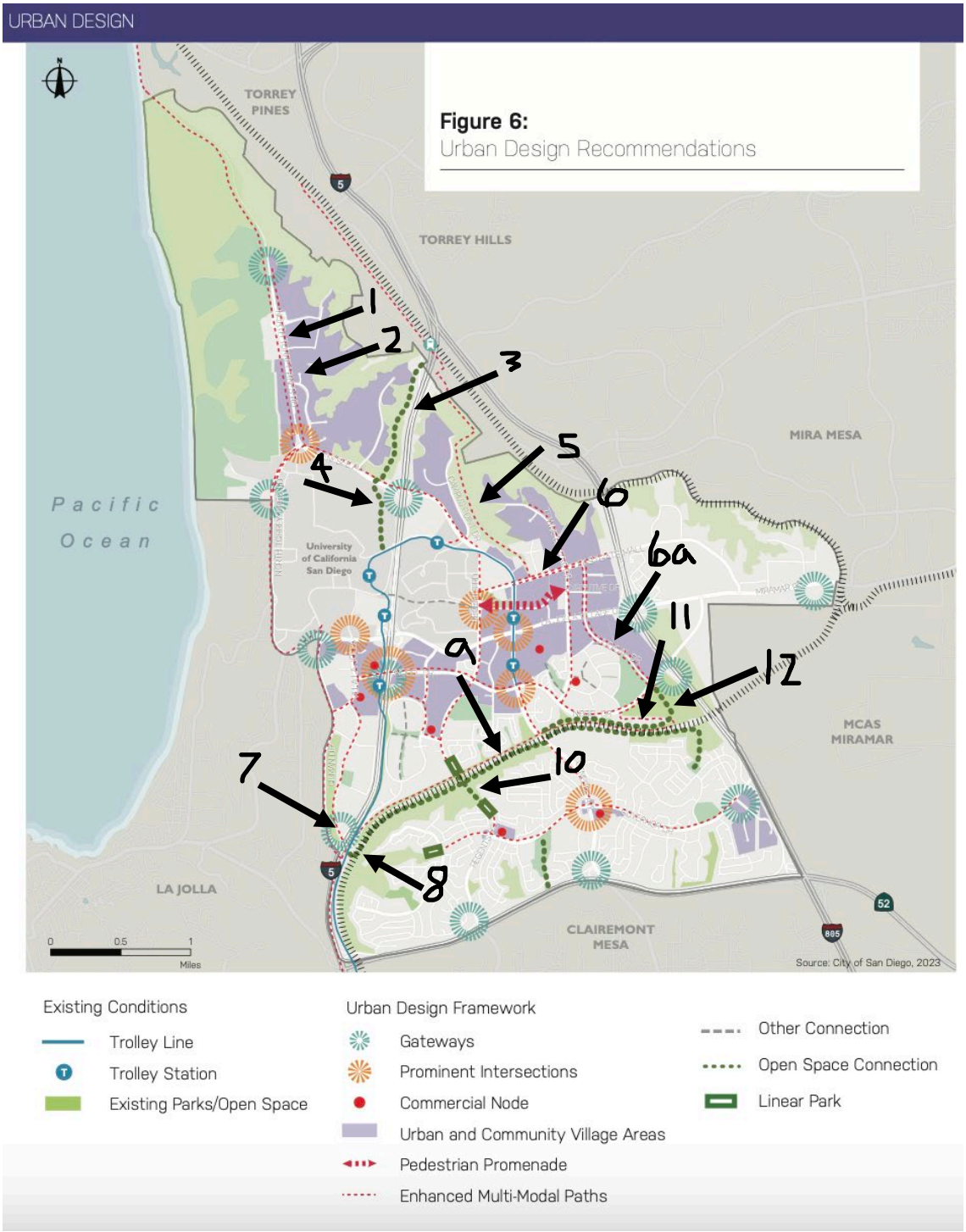
Sincerely,

Andy

Andrew Wiese
Chair, University Community Plan Update Subcommittee, UCPG

Please consider the following corrections and recommendations related to **Figure 6 – Urban Design Recommendations, p. 50**

Fig 6 – Urban Design Recommendations p.50



a) Please clarify or delete concepts used in Figure 6:

Terminology in Fig 6 (e.g., Open Space Connections, Enhanced Multi-Modal Paths) is not defined.
It is used inconsistently, and
It is not consistent with other mobility and recreational facilities discussed in the plan.
The proposed mobility routes are not ground-truthed. Many are inconsistent with city policy.

b) Please delete the "open space connections" [OSC's] in Fig. 6 that do not appear in Fig. 27.

"Open space connection" is not a defined feature in the D-UCP or D-EIR.
"OSCs" do not appear to have been vetted by city staff for consistency with PMP, MHPA and other city guidelines.

- Please delete the proposed "open space connection" running parallel to I-5 north and south of Genesee Ave or relabel as an EMMP (see #3 and #4).
  This appears to be the Coastal Rail Trail - an existing class 1 bike path (EMMP).
  If it is not, there is no justification for a second mobility route on this same line (MHPA).

- Please delete the proposed "OSC" connecting the ends of Regents Road (see #10)
  The 2016 Plan Amendment and EIR specifically rejected this route.
  The UC Plan Update process has consistently rejected a transportation route in this location.
  This connection requires an illegal Railroad crossing.
  It is in inconsistent with MHPA/PMP guidelines.

- Please delete proposed "OS Connection" in Rose Canyon crossing the railroad ROW from Rose Canyon Open Space Park to LJ Colony Dr (see # 8).
  There is no legal RR crossing at this location.

- Please delete proposed "OS Connection" crossing onto Nobel Hill from Judicial Dr. (see #12)
  Route marked as "Existing Informal trail – to be closed" in plan (Fig 27) and EIR
  Route does not appear in Bicycle Master Plan
  Route bisects highly sensitive habit – vernal pool complex X-5 and Federal designated habitat for *Navaretia fossalis*, MHPA
  Routing violates PMP, MHPA, and VPHCP guidelines for trails.
  Mobility is an inconsistent use in MHPA.

c) Please ensure consistency in representation of Open Space Connections and Enhanced multi-modal paths in Fig. 6.

These labels are used inconsistently.

- As above, please re-label the Coastal Rail Trail/class I bike path along I-5 north of Genesee Ave (see #3-4).
  This is a paved multi-modal path.
  It is erroneously represented as an "Open space connection."

- Please identify/add the Coastal Rail Trail on the map – all routes
  North of UCSD – I-5 bike path
  on UCSD campus and
  south of UCSD

- Please represent EMMP's consistently – one line or two lines.
  Some routes show Enhanced Multi Modal Paths on both sides, some on one
  North Torrey Pines Road EMMP (see # 1) Two EMMP's are shown – delete 1
  Judicial Drive/Nobel Drive EMMP (see #6a) Two EMMP's are shown – delete 1

Eastgate Mall EMMP (see # 6) Two EMMP's shown – delete 1

- Please Re-label the EMMP in Roselle Canyon as an Open Space Connection (see #5)
  Follow Figure 27, which identifies this location for a trail in the MHPA
  The route is not appropriate for enhanced multi-modal path.
  The route is in MHPA.
    See p 130: "*Note that trails and recreation on lands subject to the Multi-Habitat Planning Areas (MHPA) should comply with the Multiple Species Conservation Program (MSCP) for compatibility. ... However, development not in compliance with MHPA policies is not allowed within the MHPA (refer to the Parks Master Plan section on Conservation, Sustainability, and Resilience Policies for more information).*
  Route is not in SD Bicycle MP (it was studied and rejected through public process - it ranked last among 8 proposed routes for CRT and was deleted from BMP)

d) Please remove EMMPs and other facilities that do not appear in City Bicycle Masterplan

- Please delete "Enhanced multi-modal path" through the Lucera HOA (see #11).
  Proposed route does not appear in City Bike Masterplan,
  It is not identified as a potential route by SANDAG
  Trail is proposed for private property through a gated community.

- Please delete EMMP shown on north side of Rose Canyon (see #9)
  This proposed trail does not appear in City Bicycle Masterplan.
  It crosses MHPA lands, which is not an appropriate location for EMMPs
  It traverses private property owned by three separate HOA's
  It was studied and rejected as a future bicycle (multi-modal) route by the City of San Diego
    as part of the Coastal Rail Trail process.

e) Please remove EMMPs and other facilities that are located on private property.

- Please delete "Enhanced multi-modal path" through the Lucera HOA (see #11).
  Proposed route does not appear in City Bike Masterplan
  It is not identified as a potential route by SANDAG
  It does not appear in Fig 27
  Trail is proposed for private property through a gated community.
  See section d) above.

- Please delete EMMP shown on north side of Rose Canyon (see #9)
  This proposed trail does not appear in City Bicycle Masterplan.
  It crosses MHPA lands, which is not an appropriate location for EMMPs
  It traverses private property owned by three separate HOA's
  It was studied and rejected as a future bicycle (multi-modal) route by the City of San Diego
    as part of the Coastal Rail Trail process.
  See section d) above.

- Please delete the EMMP connecting Caminito Gianna to Gilman Drive (see # 7)
  This route does not appear in City Bicycle Masterplan.
  It does not appear in Fig 27 (or subsequent Urban Design maps).
  It traverses private property (and steep slopes) owned by condominium owners and the Southpointe HOA.

f) Consider adding existing or proposed EMMPs to Fig 6.

- Please add EMMP from Cray Ct crossing new bridge from Mirati to Spectrum (see #2).
  Take advantage of recently constructed bridge spanning the canyon and connecting these
  Developments for bike and pedestrian traffic.

- Please add potential EMMP proposed for Tower Road.
  Assure consistency with p 79 and 81, where this potential route is shown

From:	Michael A. Stonehouse
To:	Lukes, Suchitra; Tomlins, Coby; Causman, Nathen
Cc:	Nancy Zytko; Kyle Stevens
Subject:	[EXTERNAL] Extracted pages from 3024.03 UCP Draft Update Redline.pdf
Date:	Thursday, April 25, 2024 2:47:15 PM
Attachments:	Extracted pages from 3024.03 UCP Draft Update Redline.pdf

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hello Suchi/Nathen/Coby,

Thank you for meeting with us this week regarding the UC Plan update. Attached are the pages with reline markups we discussed in the meeting. I am available for any questions you may have regarding the markups or any other issue.

Thank you

michael stonehouse | aia, leed ap | associate principal | architect
carrier johnson + CULTURE associate principal

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Pedestrian features mean a *paseo*, pedestrian path, or multi-use pedestrian and bicycle path. Refer to the Street Design Manual for the design of multi-use paths.

Platform means a public space located above the ground level that encroaches into the public right-of-way to connect an elevated light rail transit station to adjacent buildings.

Plaza means a public space at ground level with is primarily composed of hardscape.

Podium means a public space located above ground level on a building or parking structure.

Promenade means an enhanced pedestrian area parallel to the public right-of-way with a pedestrian pathway to enhance the *throughway zone* with the public right-of-way and can include seating areas, shrub beds, shade trees and plants in containers.

Public space means a publicly accessible area that is adjacent to or accessible from a public right-of-way that provides opportunities for social interactions and recreational activities. Public spaces can include play areas, pedestrian pathways, seating areas, game tables, performance or gathering areas, water features, usable lawn areas, paving, shrub beds, shade trees and plants in containers. Public spaces include *plazas*, *podiums*, *platforms*, *promenades*, and *urban greens*.

Stepback means the distance measured from a *property line* to the building walls of the upper floors of a building above a specified height.

Street wall means the exterior walls of the building fronting along a *property line* adjacent to any public right-of-way or the *parkway*.

Throughway zone means the section of the public right-of-way between the *furnishing zone* and the *frontage zone* or the building fronting the street. It is the area intended for pedestrian travel only, such as a sidewalk, and should be entirely clear of obstacles, including driveway aprons.

Urban green means a public space at ground level, primarily composed of multi-purpose turf or other active usable ground cover.

3. General Requirements

The following supplemental development regulations apply to *development* in the boundaries of the University CPIOZ-Type A.

A. Public Space

SDR-A.1. Required Public Spaces. "Urban Open Space"

Public spaces shall be required with the following amenities, and in accordance with SDR-A.2:

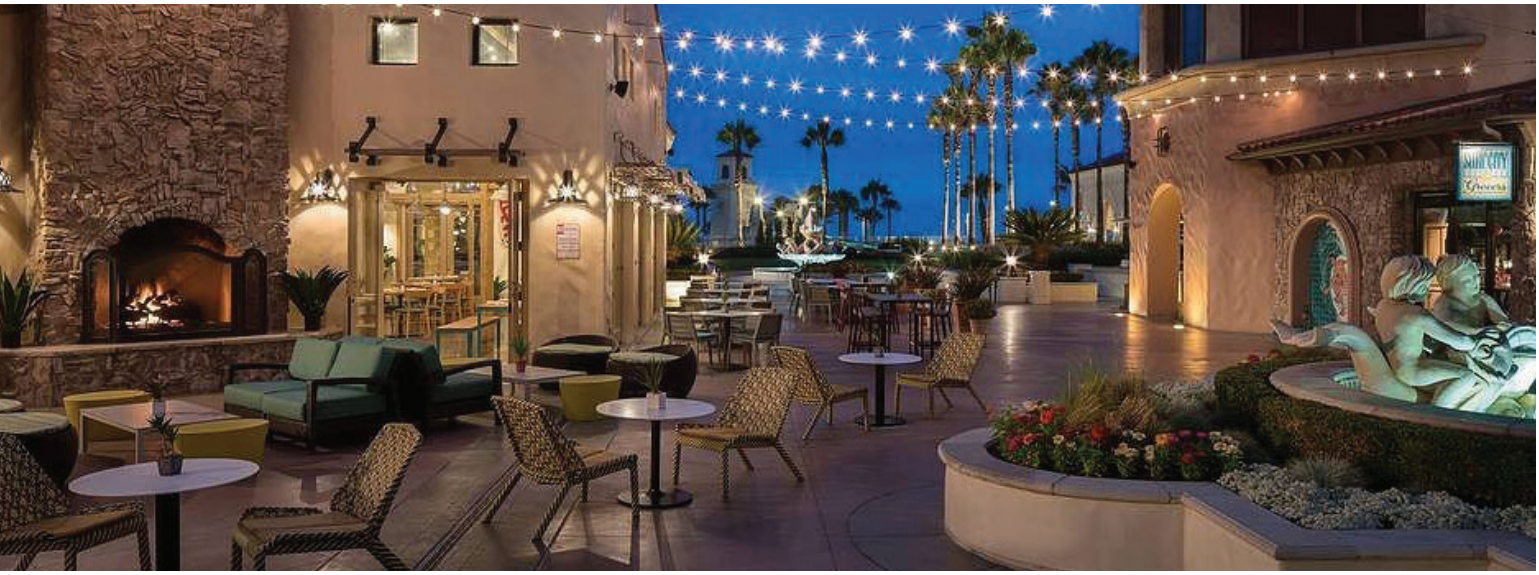
1. *Development* on a *premises* equal to or greater than 400,000 square feet shall provide public spaces that include at least 6 amenities identified in Table 2.
2. *Development* on a *premises* equal to or greater than 200,000 square feet, but less than 400,000 square feet shall provide public spaces that includes at least 3 amenities identified in Table 2. 9.18 Ac
3. *Development* on a *premises* equal to or greater than 100,000 square feet, but less than 200,000 square feet 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 leat 1 of the amenities identified in Table 2.

Example public space with high-quality amenities.

Table 2 Public Space Amenity Types[1]		
Amenity Type	**Required Amenity Features**	**Category[2]**
All-Weather Shade Cover/ Pavilion with Tables and Seating	One all-weather shade cover/pavilion measuring 400 square feet or greater, with a minimum of two sets of fixed or movable tables and chairs. Shade covers shall not replace appropriate tree plantings or count toward tree canopy coverage.	1
Community Garden	A community or native demonstration garden containing at least 10 plots with a minimum of 100 square feet of soil area per plot, as well as a water meter and access to water. (1,000 sf total)	1
Interactive/Technology Element[3, 4]	A piece of interactive or technology element (publicly accessible Wi-Fi, solar panel furniture/feature, touchable information board, smart kiosks, etc.) that is accessible to the public.	1
Multi-Purpose Turf Area	A minimum of 10,000 square feet of continuous turf with minimal sloping to support universal access.	1
Off-Leash Dog Area	A minimum of 2,000 square feet of fenced-in, off-leash dog area.	1
Placemaking Elements [3, 4]	A minimum of two (2) placemaking elements such as free library stands, decorative lighting, interactive art, interactive playscape, climbing walls, elements of historical or cultural relevance, community activation elements/games, gathering areas, multi-functional "centerpiece" furniture, or similar.	1
Play Area	A minimum of 750 square feet with children's play equipment and safety surfacing. Separate play areas should be provided for kids ages 2-5 and 5-12. A minimum of three (3) play pieces shall be provided per play area.	1
Fitness Circuit[3]	A minimum of three (3) pieces of fitness equipment with clear signage. Circuit equipment must be accompanied by a connecting path.(~500 sf)	1
Plaza or Performance/Event Space[3]	A minimum of 2,500 square feet of paved area with seating, lighting and utilities (power, data, sound).	2
Splash Pad[3]	A Splash Pad (otherwise considered a "water playground") measuring a minimum of 750 square feet.	2
Sports Court with Lighting	A minimum of one (1) full court or two (2) half-courts for sports such as basketball, tennis, pickleball, or sand volleyball. Lighting shall be provided, and shall be sited and directed to minimize impacts to nearby residential uses.	2

[1] All amenities shall be open and available to the public from at least 8:00 a.m. to 8:00 p.m. year-round or during hours of business operations.
[2] Amenities in category 2 shall satisfy two single amenities requirements.
[3] *Development* shall not utilize this specific amenity more than once.
[4] An alternative compliance determination will be made by the Planning Director for amenities not listed in Table 2.

Ample seating opportunities make public spaces more enjoyable.



SDR-A.2 Required Public Spaces Regulations.
All required *public spaces* shall comply with the following:

1. Public Space Type. An applicant can choose to satisfy its *public space* requirements under SDR-A.1 through the provision of one or more of the following *public space* types: *plaza*, *promenade*, *podium* or *platform*.

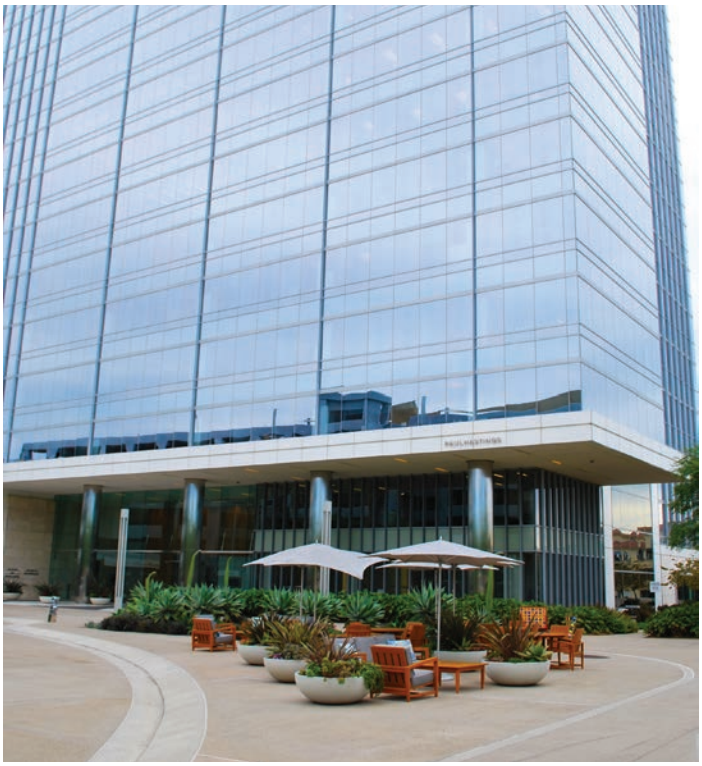
   a. A *plaza* shall meet the following requirements:

      i. The minimum area shall be 1,250 square feet;

      ii. The minimum length and width shall be 20 feet; and

      iii. Shall be in the front yard or street side yard. (See Figure 36.)

contradicts Table 2
min. size of 2,500 sf



Example implementation of a plaza.

   b. A *podium* shall meet the following requirements:

      i. The minimum area shall be 3,000 square feet;

      ii. The minimum length and width shall be 20 feet,;

      iii. Pedestrian access shall be provided from the ground level;

      iv. At least one building entrance shall be provided from the *podium*; and

      v. A pedestrian connection to a pedestrian bridge shall be provided where the development is adjacent to a pedestrian bridge. (See Figure 37.)

Example implementation of a podium public urban space.

2. Adjacent Building Façade. A minimum of one building façade shall face the *public 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 a commercial or residential uses.

   b. The abutting public space shall be accessible from the adjacent building entrances as follows:

      i. Each commercial retail tenant space or residential dwelling unit; or

      ii. A building's common area for buildings without retail tenant space or residential dwelling units.

   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*.

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*.

4. Pedestrian Circulation. The pedestrian circulation system for the *development* shall include a minimum of one connection to the *public space*.

5. Setbacks. The *public space* may be located in the required setbacks and may front the *property line*.

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.

7. Public Access.

   easement

   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.

   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.

9. Landscaping.

   a. A minimum of one, 24-inch box canopy street tree is required for each 25 feet of street frontage;

   b. A minimum of 20 percent of the *public space* area shall be comprised of landscaping;

   c. The *public space* shall include landscape designs that provide viewable surveillance, including visibility from the abutting building and *parkway*; and

   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.

10. Design.

    a. Lighting shall be provided on either poles or bollards at the entrance, pedestrian pathways and edges of the *public spaces*;

    b. Seating shall be provided at a minimum of at least one linear foot for every 100 square feet of *public space*;

    c. A minimum of 50 percent of the *public space* shall be free of physical barriers or obstructions to ensure universal access;

    d. *Public spaces* shall provide pedestrian connections to the abutting *throughway zone* and building entrances; and

    e. A trash and recycling container shall be provided at a minimum of one for every 100 linear feet of *public space* that abuts a throughway zone.

    f. Patios, tables, and seating operated by on-site commercial tenants may be included within the *public space* if they are accessible to the public and are limited to no more than 20 percent of the *public space* area.

11. Parking structure entrances, driveways or passenger drop-offs are only permitted within a *public space* if the *premises* does not have access to another public right-of-way, subject to the satisfaction of the City Engineer.

12. Automobile parking spaces, loading berths/zones, trash storage facilities, utility boxes, as well as the access or service for these facilities are not permitted within the *public space*.

13. Improvements within the public right-of-way shall be designed to the satisfaction of the City Engineer based on City standards.

14. *Developments* providing a *public space* may count the square footage of the *public space* and/or *promenade* toward the private and common open space requirements of the base zone.

15. If archaeological, tribal cultural, historical, or environmental resources limit the ability to meet the required area for the *public space*, the required area may be reduced to avoid the resource to the satisfaction of the City Manager.

16. Required best management practices (BMPs) for stormwater may be constructed within the landscaped area of the *public space*, so long as pedestrian access to and within the *public space* is not hindered by the BMPs.

17. If required stormwater, public utility, or transit infrastructure or facilities limit the ability to meet the required area for the *public space*, the required area may be reduced to locate the required infrastructure or facilities to the satisfaction of the City Engineer.

SDR-A.3 Executive Drive Promenade.

1. *Development* fronting the north side of Executive Drive from Regents Road to Judicial Drive shall satisfy its requirements under SDR-A.1 by providing a *promenade* along Executive Drive.

2. *Development* fronting the north side of Executive Drive from Regents Road to Judicial Drive shall provide a *parkway* adjacent to the *promenade* with a minimum width of 35 feet comprised of the following:

   a. A pedestrian path of travel shall have a minimum width of 15 feet;

   b. A separated bikeway shall have a minimum width of 6 feet with a 1.5 foot wide buffer on each side of the bikeway between the pedestrian path of travel and the *furnishing zone*; and

   c. A *furnishing zone* with a minimum width of 6 feet from the face of curb inward.

   d. A *frontage zone* is not required.

SDR-A.4 Public Space Requirements Exemptions.
Exemptions to the requirements to provide *public spaces* under SDR-A.1 shall apply in the following circumstances:

1. *Development* shall be exempted from providing *public space* if the *development* is located on *premises* less than 25,000 square feet, or with a *development* gross floor area less than 75,000 square feet;
2. *Development* that qualifies for an exemption to the Citywide Park Development Impact Fees by constructing on-site park improvements in accordance with SDMC Section 142.0640 and City Council Policy 600-33 shall not be required to comply with SDR-A.1 or SDR-A.2 as it relates to providing a *public space*; or
3. *Development* that utilized an incentive purchased through the *Public Space In Lieu Fee Option*.

SDR-A.5 Public Space In Lieu Fee Option
As an alternative to providing the required public space, an applicant may choose to opt for one or both of the following options:

1. The applicant may purchase amenity points, up to a maximum of 25% of the total required amenities based on Development size (with a minimum of 1 amenity point) at a rate of $480,835 per amenity point. Payment shall be deposited into the Citywide Park Development Impact Fee Fund prior to final inspection.
2. The applicant may purchase a reduction in the required size of the public space amenity at a rate of $170 per square foot of reduction, up to a maximum of 25% of the total required public space amenity size. Payment shall be deposited into the Citywide Park Development Impact Fee Fund prior to final inspection.

These payments should offset the SD Parks Master Plan requirements or in-lieu fees.

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).

   b. A pedestrian path shall be continuous, clear of obstructions and shall have a minimum width of 5 feet.

   c. Multi-use path for pedestrians and bicycles shall be continuous, clear of obstructions and shall have a minimum width of 12 feet.

2. The pedestrian feature shall connect the primary building entrances, each commercial tenant space, *public spaces* and vehicle parking areas from a *parkway* along an abutting public or privately maintained street.

3. Pedestrian entrances located at the front or street side *property line*, where the building setback is zero, qualify as a required pedestrian feature.

4. For *premises* fronting more than 3 public or privately maintained streets, pedestrian path shall connect to at least three streets. A *paseo* connecting at least two public or privately maintained streets shall satisfy this requirement.

Request credit for internal streets with pedestrian elements.

Example implementation of a paseo.

20 feet may be too wide in some cases. In projects with shorter length paseos, the width may work better narrower. Consider proportions, such as building height and paseo length. Lower buildings should allow narrower paseos. Narrow pedestrian street can be more attractive and intimate.

C. Building Transition

SDR-C.1 Building Transition - Residential.

Development with a residential use with a structure height exceeding 30 feet on a property with a permitted density of greater than 55 dwelling units per acre abutting residential zoned properties with a permitted density of less than 30 dwelling units per acre shall not exceed the transition plane as shown in Figure 42 and subject to the following requirements:

1. A 65-degree angle transition plane shall start at a point 30 feet above the finished grade;
2. The building shall be setback 20 feet from the side or rear yard *property line* that abuts lower density residential zoned property;
3. The base of transition plane shall end at a point that extends 45 feet from the side or rear yard *property line* that abuts lower density residential zoned property; and
4. The height of the transition ~~plan~~ plane shall not exceed 95 feet above the finished grade.

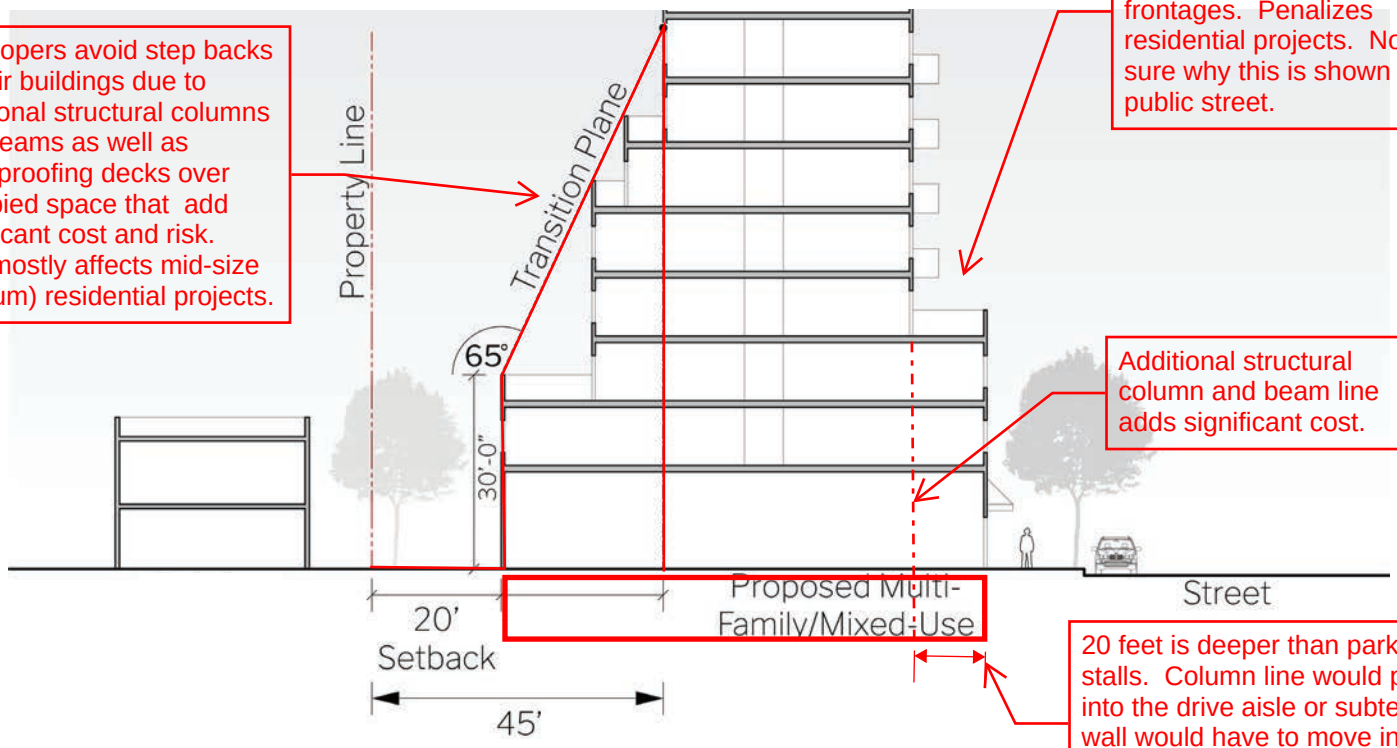
SDR-C.2 Building Transition - Open Space.

Development with a residential use abutting open space zoned properties shall not exceed a transition plane as shown in Figure 42.

1. A 65-degree angle transition plane shall start at a point 30 feet above the finished grade;
2. The building shall be setback 20 feet from the side or rear yard *property line* that abuts open space zoned property;
3. The transition plane base shall end at a point that extend 45 feet from the side or rear yard *property line* that abuts open space zoned property; and
4. The height of the transition plane shall not exceed 95 feet above the finished grade.

2. 20 feet does not work for buildings. This is deeper than parking stalls and creates additional column lines the entire height of buildings. See comments below.

Figure 36:
Transition Standards



Developers avoid step backs in their buildings due to additional structural columns and beams as well as waterproofing decks over occupied space that add significant cost and risk. This mostly affects mid-size (podium) residential projects.

This street wall step back is inappropriate for all of the community at street frontages. Penalizes residential projects. Not sure why this is shown at a public street.

Additional structural column and beam line adds significant cost.

20 feet is deeper than parking stalls. Column line would project into the drive aisle or subterranean wall would have to move inboard of PL which would force the street wall back.

D. Parking Structure Screening

SDR-D.1 Parking Structure Screening.
Above ground automobile parking structure façades fronting a public or privately maintained street shall be screened with landscaping, or an architectural screening.

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*.

F. Pedestrian Improvements and Crossings

SDR-F.1: Pedestrian Improvements to UTC Transit Center.
Development fronting or containing the pedestrian path between the Executive Drive Transit Center and the UTC Transit Center (Pedestrian Path) as shown in Figure 16 shall provide the pedestrian path as follows:

1. The Pedestrian Path shall have a minimum width of 10 feet and shall provide a continuous path of travel from La Jolla Village Drive between Costa Verde Boulevard and Genesee Avenue, then traveling south along Brooke Court and east along Esplanade Court to connect to the Genesee Avenue and Esplanade Court intersection towards the UTC Transit Center;
2. A public access easement shall be provided for the Pedestrian Path located within private property, and shall be privately maintained by the private property owner and open to public access during hours of operation of the trolley at the UTC and Executive Drive Transit Centers; and
3. The Pedestrian Path shall include an enhanced pedestrian at-grade pedestrian crossing across La Jolla Village Drive at Costa Verde Boulevard, designed to the satisfaction of the City Engineer; and
4. The Pedestrian Path shall be completed to the satisfaction of the City Engineer no later than one (1) year from the final inspection of the final approved phase of the subject development, except that the pedestrian at-grade pedestrian crossing across La Jolla Village Drive as specified in C. above may be completed two (2) years from the date that the City approves all required permits for the crossing. A performance bond shall be provided prior to issuance of building permits for development on the subject development property.

SDR-F.2: Pedestrian Improvements.
Development fronting other pedestrian improvements shown in Figure 16 shall provide the following type of improvements:

1. Enhanced pedestrian at-grade crossings or overcrossings designed to the satisfaction of the City Engineer;
2. An irrevocable offer of dedication shall be provided for the area needed for any future pedestrian overcrossing the proposed improvements to the satisfaction of the City Engineer.

G. Complete Streets

SDR-G.2: Complete Streets.
Development fronting the street segments identified in Table 6 shall maintain a minimum *centerline* to *curbline* distance to allow for sufficient public right-of-way for bicycle facilities, flexibile lanes, and general purpose lanes.

H. Community-Serving Retail Development

SDR-H.1 Community Serving Retail (Smaller Sites).
1. *Development* with a residential use on a property designated community village in the University Community Planning Area that are equal to or greater than 50,000 square feet and less than 100,000 square feet in area shall maintain a minimum of 25 percent of gross floor area or 30,000 square feet of gross floor area, whichever of the two is less, for commercial services and retail sales uses.
2. The calculation of gross floor area shall include all buildings excluding structured parking within the *premises*.

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.

and/or

I. Freeway-Adjacent Development

SDR I.1 Exterior Common Open Space Adjacent to Freeways.

a combination of

Buildings with residential uses on a *premises* abutting a freeway right-of-way shall not have exterior common open space within 30 feet from the *property line* abutting a freeway right-of-way.

Table 4: Planned Bicycle Classifications Modifications			
Roadway	**Segment**	**Existing**	**Planned Classification Designation**
Towne Centre Dr	Executive Dr to La Jolla Village Dr	Class II	Class II (Buffered)
Towne Centre Dr	La Jolla Village Dr to Nobel Dr	N/A	Class II (Buffered)
Shoreline Dr	Renaissance Ave to Nobel Dr	N/A	Class II (Buffered)
Villa La Jolla Dr	Jolla Village Dr to Gilman Dr	Class III	Class IV (One Way)
University Center Ln	La Jolla Village Dr to Lebon Dr	N/A	Class IV (One Way)

Table 5: Planned Street Classifications Modifications			
Roadway	**Segment**	**Existing Functional Classification**	**Planned Classification Designation**
Arriba St	Palmilla Dr to Regents Rd	4-Ln Major Arterial	2-Ln Major Arterial
Eastgate Mall	Judicial Dr to I-805 Overpass	4-Ln Major Arterial	3-Ln Collector
Executive Dr	Regents Rd to Judicial Dr	4-Ln Collector w/ TWLTL	2-Ln Major Arterial
Executive Way	Executive Dr to La Jolla Village Dr	4-Ln Collector w/ TWLTL	2-Ln Collector w/ TWLTL
Genesee Ave	N Torrey Pines Rd to I-5 SB Ramp	6-Ln Prime Arterial	4-Ln Prime Arterial
Genesee Ave	I-5 SB Ramps to I-5 NB Ramps	4-Ln Major Arterial	4-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Genesee Ave	I-5 NB Ramps to Campus Point Dr	6-Ln Prime Arterial	4-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Genesee Ave	Campus Point Dr to La Jolla Village Dr	6-Ln Major Arterial	4-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Genesee Ave	La Jolla Village Dr to Esplanade Ct	4-Ln Major Arterial	4-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Genesee Ave	Esplanade Ct to Nobel Dr	6-Ln Major Arterial	4-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Genesee Ave	Nobel Dr to SR-52 WB Ramp	4-Ln Major Arterial	4-Ln Major Arterial (SMART)
Gilman Dr	La Jolla Village Dr to Villa La Jolla Dr	4-Ln Major Arterial	4-Ln Major Arterial w/ 2 Flex Lanes
Governor Dr	Regents Rd to Greenwich Dr	4-Ln Major Arterial	2-Ln Major Arterial
La Jolla Village Dr	Torrey Pines Rd to Villa La Jolla Dr	6-Ln Prime Arterial	4-Ln Prime Arterial w/ 2 Flex Lanes
La Jolla Village Dr	Villa La Jolla Dr to I-5 SB Ramps	7-Ln Prime Arterial (4 EB, 3WB + 1 WB aux)	5-Ln Prime Arterial w/ 2 Flex Lanes
La Jolla Village Dr	I-5 SB Ramps		4-Ln Prime Arterial w/ 2 Flex Lanes (SMART)
La Jolla Village Dr	I-5 NB Ramps		4-Ln Major Arterial w/ 2 Flex Lanes (SMART)
La Jolla Village Dr	Towne Center		4-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Lebon Dr	Palmilla Dr to		2-Ln Major Arterial
Lebon Dr	Nobel Dr to La		3-Ln Major Arterial
Miramar Rd	I-805 SB Ram		4-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Miramar Rd	I-805 NB Ram		6-Ln Prime Arterial w/ 2 Flex Lanes
Miramar Rd	Nobel Dr to Ea		5-Ln Prime Arterial w/ 2 Flex Lanes
Miramar Rd	Eastgate Mall		4-Ln Major Arterial w/ 2 Flex Lanes
Nobel Dr	Villa La Jolla D		2-Ln Major Arterial w/ 2 Flex Lanes
Nobel Dr	University Center Ln to Genesee Ave	6-Ln Major Arterial	4-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Nobel Dr	Genesee Ave to Towne Center Dr	4-Ln Major Arterial	2-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Nobel Dr	Towne Center Dr to Judicial Dr	6-Ln Major Arterial	4-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Nobel Dr	Judicial Dr to Avenue of Flags	5-Ln Prime Arterial	3-Ln Major Arterial w/ 2 Flex Lanes (SMART)
Regents Rd	Genesee Ave to Eastgate Mall	2-Ln Collector w/ TWLTL	4-Ln Major Arterial
Regents Rd	Executive Dr to La Jolla Village Dr	4-Ln Collector w/ TWLTL	4-Ln Major Arterial
Regents Rd	La Jolla Village Dr to Nobel Dr	5-Ln Major Arterial	4-Ln Major Arterial
Regents Rd	Nobel Dr to Arriba St	4-Ln Major Arterial	2-Ln Major Arterial
Villa La Jolla Dr	Gilman Dr to La Jolla Village Dr	4-Ln Major Arterial	2-Ln Major Arterial w/ 2 Flex Lanes
Notes:			
#-Ln = Number of Lanes			
SM = Striped Median			
TWLTL = Two-Way Left-Turn Lane			
A SMART Corridor is a Major Arterial with a flexible lane in each direction that provides access to or between at least two freeways, whereby mobility improvements are made for multimodal modes through the repurposing of roadway space.			

We highly recommend avoiding reduction of traffic lanes as this is the only arterial street in South UC connecting the east and west. This is the main commercial thoroughfare of South UC which will experience more congestion at peak hours of the day.

The San Diego Street Design Manual does not explain or illustrate a 2-Lane Major Arterial.

Atlantis Group

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April 25, 2024

Ms. Heidi Vonblum
City of San Diego Planning Department
202 C Street, M.S. 413
San Diego, CA 92101

Dear Ms. Vonblum:

This correspondence serves to comment on the second draft of the University Community Plan Update (CPU). I am providing this letter on behalf of the property ownership (8650 Villa La Jolla, Inc.) for the La Jolla Village Square site. We previously submitted letters in December 2022 and August 2021. We were also part of the group of property owners who commented on the Community Plan Implementation Overlay Zone Type A (CPIOZ) Supplemental Development Regulations (SDRs) in the Discussion Draft of the University Community Plan Update (CPU). Thank you for providing the opportunity to continue to participate in the CPU process.

The only comment that we have on this second draft of the CPU is to correct a typographical error. Page 36 of the CPU correctly identifies the density and intensity of the "Urban Employment Village High-2" designation as "(0-145 du/ac, FAR up to 5.0)." That aligns with the City's proposed zoning of those areas as EMX-2, a zone that allows a maximum FAR of 5.0 per SDMC Table 131-07B. The typographical error is in the FAR listed for the Urban Employment Village High-2 Land Use Designation in Figure 3: Planned Land Use. In the legend under the Land Use Designations, Figure 3 mistakenly lists the maximum FAR in the "Urban Employment Village High-2" area as **3.0**. In the final version of the CPU, we ask that the City correct the typographical error in Figure 3 to read "Urban Employment Village High-2 (0-145 du/ac, FAR up to **5.0**)."

At this time, we have no additional comments regarding the second draft of the CPU. To make sure that my assessment that the FAR should be corrected to 5.0 is accurate, I would very much appreciate your confirming for me that this revision will be made.

Thank you very much for your assistance in the matter. I can be reached at mescobareck@atlantissd.com or 619-523-1930.

Respectfully,

Marcela Escobar-Eck
President/CEO
Atlantis Group Land Use Consultants

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April 24, 2024

Planning Director Heidi Vonblum
City of San Diego Planning Department
9485 Aero Dr, M.S. 413
San Diego, CA 92123
VonblumH@sandiego.gov

Re: University City Community Plan Update (CPU)

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to express our support for adopting the most robust and pro-housing, pro-climate options for the University City Community Plan Update.

Circulate, alongside our allies, has championed a plan addressing the urgent need for increased homes and access to transit in our region. Our report "Making the Most of The Mid-Coast Trolley" highlights the significant benefits the University City community could enjoy from expanding housing options in the area.

We appreciate City Staff for including the most robust plan as an alternative for the Environmental Impact Report and are thrilled to see that it is recognized as the "environmentally superior alternative." Adopting this robust alternative would be a significant win for our region.

Furthermore, Circulate recognizes that the land use plans must account for the changing needs of the University City area. We support and concur with BioCom California, as outlined in their attached March 27, 2024 letter, that adopting Urban Flex and Prime Flex land use in the EMX-1 zone in the North Torrey Pines area would open new and important opportunities. Fortunately, including those designations would not have a significant impact on the City's environmental analysis

University City will be a pivotal regional hub for San Diego for generations to come, and we are heartened to see that the present EIR and draft Community Plan Update reflect this reality. As we await the City Council's decision, Circulate remains committed to making the most of the Mid-Coast Trolley.

Please do not hesitate to contact me if you would like to discuss this further.

Best regards,

Jeremy Bloom
Chief Operating Officer
Circulate San Diego

CC:
Mayor Todd Gloria
Council President Sean Elo-Rivera
Council President Pro Tem Joe LaCava
Councilmember Kent Lee
Tait Galloway, Deputy Director, Community Planning & Housing

Attachment: Letter from Biocom California, dated March 27, 2024.

Biocom California

March 27, 2024

Via Electronic Mail (planuniversity@sandiego.gov)

City of San Diego Planning Department
202 C Street, M.S. 413
San Diego, CA 92101

Re: University Community Plan Update (CPU)

To Whom It May Concern:

On behalf of a coalition of life science organizations, Biocom California is writing to request that the city adopt Urban Flex and Prime Flex land use designations and the EMX-1 zone in an area of the North Torrey Pines mesa. A graphic of the area is attached for reference purposes.

Biocom California would first like to thank planning department staff for their extensive efforts to bring the draft CPU forward. The CPU is an innovative, long-range plan that will govern and control the development of the University Community for the next 30 plus years and will help implement goals and policies relating to housing, climate, and quality of life.

What we are seeking for the North Torrey Pines mesa through appropriate land use designations and zoning will help the city meet these goals. This change can bring housing and jobs closer together and provide flexibility and creativity to further long-range development on the North Torrey Pines mesa, ensuring that it remains a vibrant national resource of health innovation.

North Torrey Pines is the crown jewel of the San Diego life science cluster because it is home to a high concentration of renowned research institutions and life science companies. These companies have made it clear that quality workforce housing near employers has become the number one factor in employee attraction and retention.

San Diego's main competitors, Boston/Cambridge and the San Francisco Bay Area, have long been providing mixed use and residential opportunities within their life science clusters, which is a major reason they are successful at both attracting companies and producing therapies, research tools, and diagnostics. San Diego needs to provide the same opportunities to remain competitive and continue to deliver life changing treatments and cures.

A significant amount of private investment has occurred on the North Torrey Pines mesa to foster walkability, micro-mobility, and connectivity to transit, along with providing the amenities and services that life science employees ask for. The industry is actively working with transit authorities to provide shuttle services to the Blue Line Trolley, COASTER, and rapid bus stations, and to increase bus frequency. The proposed Urban Flex designation and EMX-1 zone adds the critical third component of housing to pursue the city's goal of fostering communities where residents can live, work and play.

There are currently substantial land use constraints that limit development on all or most of the North Torrey Pines mesa, including the Coastal Height Limit Overlay Zone and MCAS Miramar Accident Potential Zone (APZ) II and Transition Zone (TZ). Such constraints will continue to govern and limit development regardless of the land use designation and base zone chosen for the area.

As such, making the change to Urban Flex with an EMX-1 implementing zone in the small requested area does not have a significant impact on the environmental analysis for the CPU. We have engaged a traffic consultant to undertake a preliminary analysis, which did not identify any impact to vehicle miles traveled (VMT) or other traffic impacts and should not cause a delay to the CPU review process. Based on final comment processing times for previous community plan updates such as Mira Mesa, this change should not present any challenge in being accomplished in this final phase.

If left unchanged, these zones will remain stagnant for two plan cycles, or more than 60 years, and this portion of the community will fall short of realizing the vision set forth in the Plan to create, *"A diverse and dynamic community with renowned higher education, healthcare, scientific research and technology institutions and businesses connected through a robust multi-modal transportation network to a vibrant, mixed-use urban core and varied residential neighborhoods, which protects its unique natural habitat and canyon systems."*

The revised CPU was released on March 15 and we recognize that the CPU process is nearing completion. However, we believe it is critical that the city evaluate and incorporate this request into the CPU as it will govern development in the University Community for the next 30 years or longer. This change would help the city meet its climate and housing goals and facilitate the growth of the San Diego life science cluster in a way that increases its competitiveness while providing the housing proximity that employees are demanding.

Sincerely,

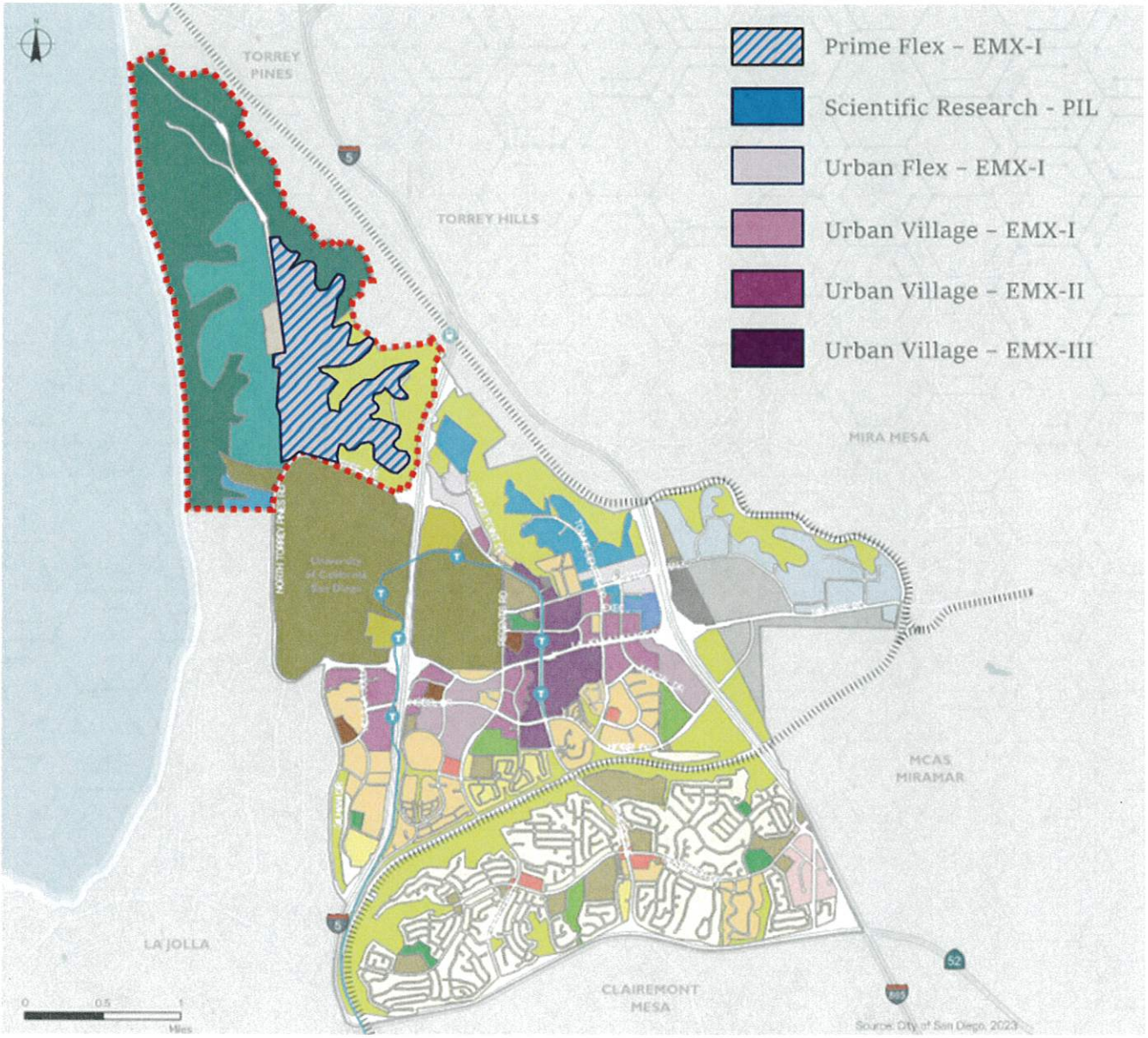
Melanie Cohn
Sr. Director, Regional Policy & Government Affairs
Biocom California

Attachment

cc: Honorable Mayor Todd Gloria (MayorToddGloria@sandiego.gov)
Honorable Council President Sean Elo-Rivera (SeanEloRivera@sandiego.gov)
Honorable Councilmember Joe LaCava (JoeLaCava@sandiego.gov)
Honorable Councilmember Kent Lee (KentLee@sandiego.gov)
Heidi Vonblum, Planning Director (VonblumH@sandiego.gov)
Tait Galloway, Deputy Director, Community Planning & Housing (TGalloway@sandiego.gov)

(Proposed Land Use for North Torrey Pines

Conversion of Scientific Research/IP1-1 to Urban Flex and Prime Flex/EMX-1. Proposal indicated with diagonal cross hatch below in the North Torrey Pines Village area bounded by Genesee to the south.



IQHQ Giving progress a home

April 23, 2023

Suchi Lukes, AICP
Planner
City of San Diego
Planuniversity@sandiego.gov

RE: Comments on the Community Discussion Draft of the University Community Plan Update

Dear Ms. Lukes,

Thank you for the opportunity to provide comments on the second draft of the University Community Plan Update released in March 2024.

As you are aware, IQHQ has participated in the University Community Plan Update process since its inception and believe that the City's vision to expand job and housing opportunities near transit will not only provide San Diego residents with greater options and connections to employment, education and healthcare but will also help our city meet its climate action plan goals and mode shift requirements.

We appreciate the City's thoughtful responsiveness to our previously provided comments. Overall, this draft is better positioned to maximize the investment in the trolley, to support the streamlining and expediting of development, and to encourage development in the biotech cluster as identified as the City's Priority #1 in the University Community Plan. However, we would like to share a few additional comments in the following pages that we believe are important clarifications to ensure the intended implementation of the vision and goals of the University Community Plan.

Thank you for your consideration of these comments and we are happy to meet to discuss anytime.

Sincerely,

Justine Nielsen
SVP IQHQ

CC: Tait Galloway
Cody Tomlins

989 Pacific Highway
San Diego, CA 92101
iqhqreit.com

Section/Page Number	Current Language	Comment
Design on Sites Adjacent to Freeways, Page 57	Freeway-Adjacent Building Design	Please clarify that this design guidance for sites adjacent to freeways applies only to sites designated as freeway adjacent parcels in Figure 35: Community Plan Implementation Overlay Zone, Freeway-Adjacent Supplemental Development Regulations.
Nobel/Campus Opportunities, Page 90-93	Graphic on page 91	The graphic on page 91 at University Centre Lane and Nobel appears to show red adjacent to the buildings on University Centre Lane designating transit plaza/mobility hub. It is not clear if this was intentional or if it is a graphic error. Please remove if it is not intentional or clarify what is envisioned in this space.
Plan Policies 2.5 Building Massing, Form and Articulation, 2.5(C)	Promote stepping back upper levels of buildings in areas where building heights vary to transition to adjacent lower building heights. Encourage incorporating architectural elements into building design that smooth the transition between the new and existing architecture	We recommend that “stepping back” be replaced with “building articulation” to provide flexibility to allow for more sophisticated curtain wall tower design. Limiting the design treatment to step backs only causes all buildings to look the same and disallows for more elegant curtain wall tower design. Additionally, requiring step backs only can have the unintended consequence of reducing the available floor plate of a building. Since large floor plates are required for life science uses, this design direction is problematic.

		As an alternative, consider replacing “stepping back” with “building articulation.” The EMX zone also has a variety of requirements for non-residential building activation and facade articulation, where the desired articulation can be achieved with angled facades, plane changes, recessed facades, etc. This modification to the CPIOZ for non-residential buildings is consistent with the UCPU’s priorities of supporting a thriving economy, recognizing the importance of the biotech cluster in University City, and supporting university advancement beyond the campus.
Plan Policies 2.5 Block Size, 2.6(A), (B), and (C)	Promote walkable block sizes that are generally no greater than 300 feet by 600 feet. Encourage any block larger than 300 feet by 600 feet to have a publicly accessible pedestrian connection (paseo) that bisects the block to reduce travel distance for pedestrians. Encourage the provision of a pedestrian public access easement (paseo) through development that is greater than four acres. These easements can provide links between public roads, high activity centers, recreational areas, and transit corridors.	While we agree with the notion of promoting walkability by breaking up larger parcels, we have concern about how this will be practically implemented. We suggest adding “where practical” to these plan policies. The University Community has sites with significant slopes and creating paths and paseos through these areas may not be possible or practical in certain instances. Additionally, there are many parcels with new development being added to existing development which can make the strict application of the regulations difficult to implement. Therefore, added flexibility to achieve the intention of these design policies would be appreciated if the intent to create

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	Explore opportunities for large site redevelopment to reduce existing block scale by establishing new streets and/or public pedestrian pathways. Encourage mid-block crossings along block faces that are no longer than 350 feet to achieve a fine-grained street grid	walkability is achieved throughout the site. Additionally, it is important that the pedestrian access not be limited to a Paseo – SDR B.1 permits for a paseo, a pedestrian path or a multiuse path with differing width requirements. Such flexibility may be necessary in certain instances. Additionally, there are concerns about requiring a public easement through a site versus the pathways being open to the public. An easement is not required for space to be open to the public and could potentially limit the areas that owners may offer to be open to the public. Alternatives can be agreements or other legal instruments. Therefore, we recommend the removal of the requirement for a recreational easement. The language could be changed to "an enforceable legal instrument" or something similar. We also recommend revising the hours of operation to typical business hours or during daytime hours, and suggest it be added that rules and regulations may be implemented for these spaces, as needed, to ensure safety and security and may be posted.
CPIOZ: SDR-A.2(2) Adjacent Building Façade, Transparency	Minimum of 60 percent of the street wall area on the ground floor shall be transparent, with clear glass visible for a	The municipal code provides thoughtful and necessary exemptions from the definition of Street Wall that need to be incorporated into the SDRs to

	commercial or residential uses.	account for various site conditions. Otherwise, projects will be elevated into a discretionary permit process unnecessarily. Due to the unique topographical nature of the University Community Planning Group Area, the notion of creating street level transparency is constrained for sites with slopes. This condition is accounted for in the Municipal Code. SDMC 131.0713(g) states "For non-residential uses, a minimum of 60 percent of the *street wall* area on the ground floor shall be transparent." Section 131.0717(c) then states that a street wall is to be provided for 70% of the building frontage along the public right of way with a listed number of exceptions which may be subtracted from the length of frontage, thereby reducing the amount of street wall required. In some cases, these reductions result in an elimination of a street wall in its totality, resulting in no transparency requirements. For example, one exception listed in SDMC 131.0717(c) is when the existing grade of the public right of way differs from the building by more than two (2) feet for a frontage. On some sites with slopes, this condition can occur for the entire frontage of a property. In a case like this, that entire length is subtracted from frontage and the street wall requirement is zero and,

		therefore, the transparency on that frontage would be zero. But the community plan language does not have the same exceptions making compliance with the regulations particularly difficult to achieve in these unique circumstances. Section 131.0717(c) then states that a street wall is to be provided for 70% of the building frontage along the public right of way with a listed number of exceptions which may be subtracted from the length of frontage, thereby reducing the amount of street wall required. Therefore, we recommend that the UCPU use the definition of Transparency from SDMC 131.0713(h and g) and also include the definition and exemptions for the calculation of street wall from131.0717(c) to ensure application of code requirements meet the intended purpose while allowing for flexibility to accommodate the topographic diversity of University Community.
CPIOZ: SDR-A.2(7) – Required Public Space Regulations - Public Access	The applicant shall record a public recreation easement against all parcels comprising the premises of development, to the satisfaction of the City Manager, for all portions of the public space not within the public right-	A recreational easement is not required for space to be open to the public and could potentially limit the areas that owners may offer to be open to the public. Alternatives can be agreements or other legal instruments. Additionally, the hours of operation to 8:00am to 8:00pm are too late for most commercial spaces.

	of-way to allow for public access and use. The public space shall be open and accessible to the public from at least 8:00am to 8:00pm year-round or during hours of business operation.	Therefore, we recommend the removal of the requirement for a recreational easement. The language could be changed to "an enforceable legal instrument" or something similar. We also recommend revising the hours of operation to typical business hours or during daytime hours, and suggest it be added that rules and regulations may be implemented for these spaces, as needed, to ensure safety and security and may be posted.
CPIOZ: SDR-A.2 – Required Public Space Regulations (1) Plazas, Page 189.	Plaza shall have a minimum size of at least 1,250 square feet and measure a minimum dimension of 20 feet. Plazas shall be located in the front yard or street side yard (see Figure 36).	These requirements are in conflict with the EMX zone. See Section 131.0718(d)(6). Plazas in the EMX zone do not have a minimum size and have a minimum width of 40 feet. We recommend removing the minimum size requirement or revising to be consistent with 131.0718(d)(6).

Andrew Wiese,
Chair UC Plan Update Subcommittee
UCPG

Corrections/Recommendations on:

I. Proposed Zoning Map

And

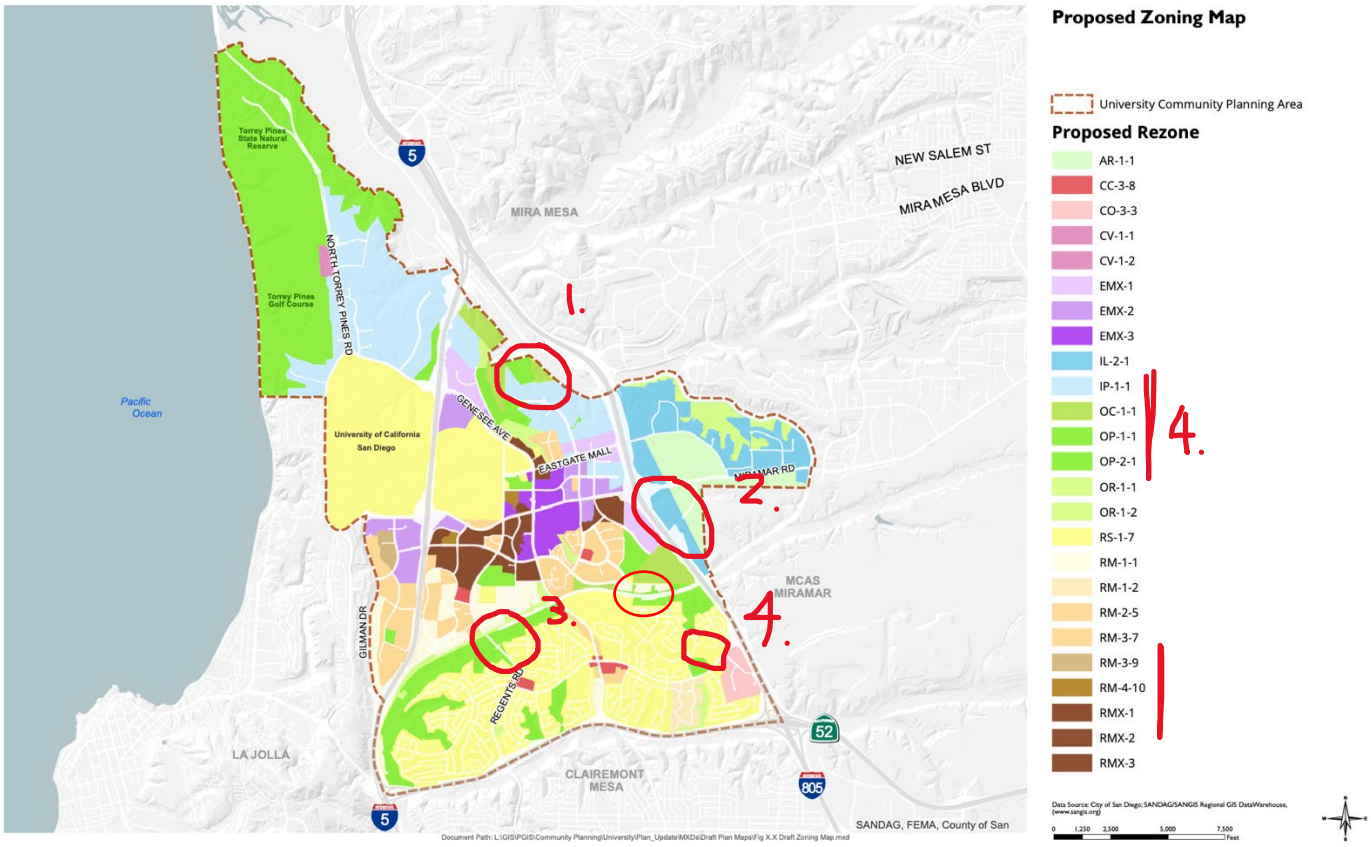
II. Figure 29, University Community Open Space.

Dear Colleagues,
Please review the following corrections and recommendations for the Proposed Zoning Map and Figure 29, UC Open Space. Thank you for your attention to these important details.

Thank you for your support for open space and MHPA lands in the University Community and for a resilient, biodiverse future that will extend beyond our lifetimes.

Sincerely,
Andy

I. Proposed Zoning Map…



https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usrfiles.com/ugd/bf5c85_4ecc973f33324345a185e8139c32e0e9.pdf

Thank you for following through with OC 1-1 zoning on New Dedication Parcels. This is the appropriate zone for these MSCP/habitat lands.

However, **the Proposed Zoning Map should be corrected/updated in several other ways** for consistency and to carry through this intention.

1. Please correct the zoning for the city-owned conservation/MSCP lands at the north end of Towne Centre Drive.

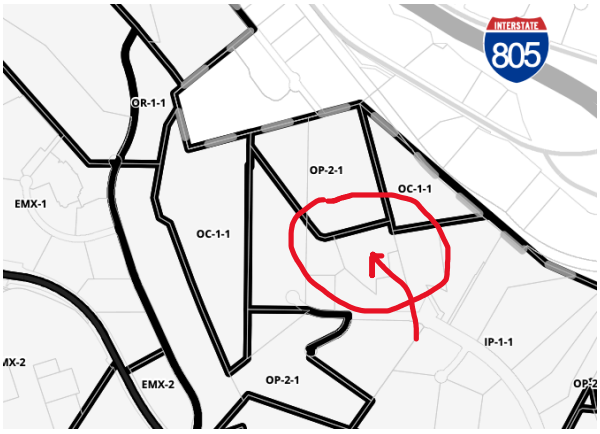
Zoning at the north end of Towne Centre Dr. should reflect the conservation agreements and conditions on the city owned MSCP open space lands in this area.

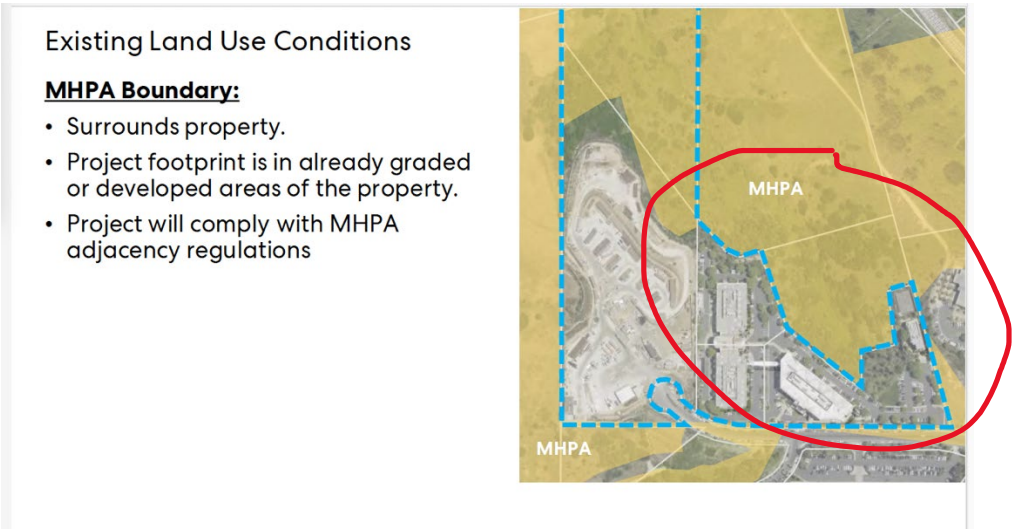
1.1. Please correct zoning on the 5-acre, city owned MSCP conservation parcel (*APN: 343-121-38)* north of Towne Centre Drive **from IP1-1 to OP 2-1 or OC 1-1.**

It is incorrectly shown in the IP zone.

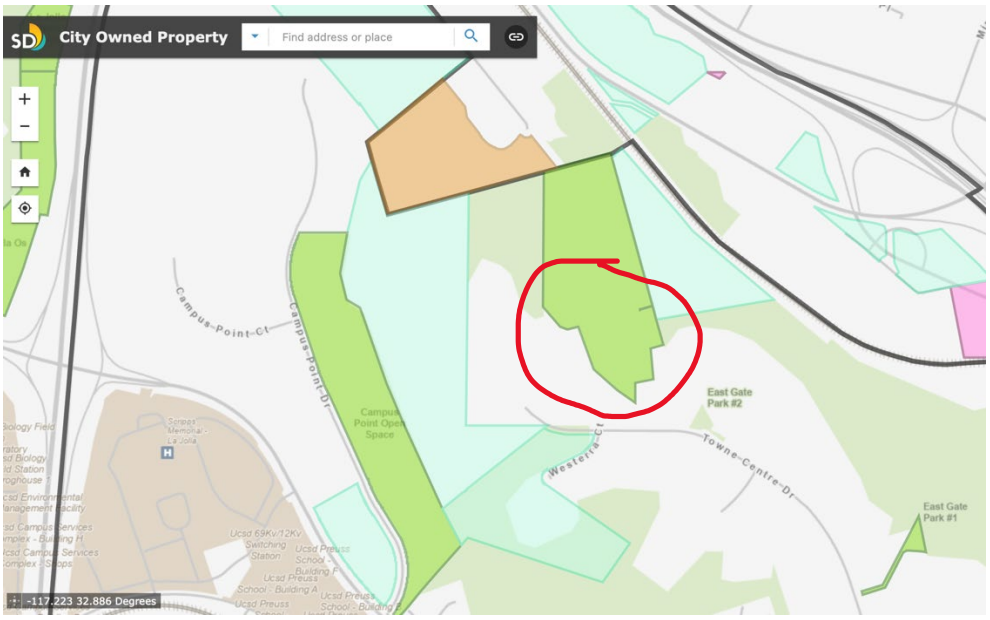
This parcel *was specifically deeded to the city in 1998 with a conservation deed "**to be preserved as permanent open space in the city's MHPA**" (see R-290280, 6/16/98, p 4) as part of the approval of the Eastgate Acres project. The parcel is APN: 343-121-38 (5 ac).*
It has been 100% conserved in the MHPA since 1998, and its zoning should reflect this status.

Compare the zoning map with the views below.





Source: Towne Centre View Project, 2022 (Biomed Realty)



1.2 Please confirm zoning for Mini-Park #2.

Zoned for park use? See above and below.

1.3 Please update zoning to OC 1-1 on the whole of the new Open Space parcel proposed for dedication at the end of Towne Centre Drive in Roselle Cyn.

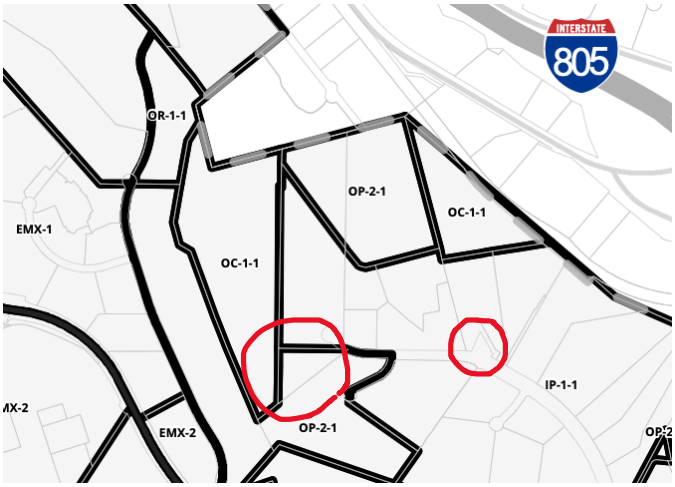
Note: The Proposed Zoning on one 5-acre triangular piece of the larger Roselle Canyon Open Space property at the west end of Towne Centre Drive, west and south of the Towne Centre View project is different from the rest.

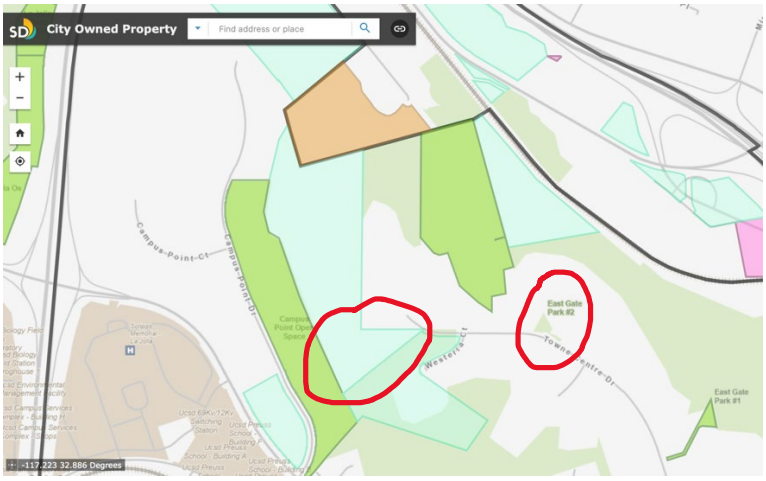
Please update to OC-1-1 to conform with the other proposed dedicated Open Space parcels.

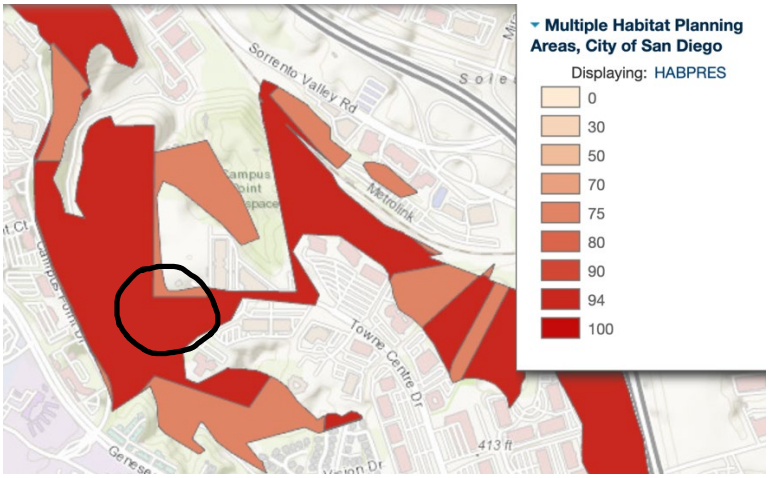
This parcel is part of the larger parcel, K302 P3, the rest of which is proposed as OC-1-1. OC-1-1 zoning is the correct zone as this parcel is 100 percent conserved in the MHPA and

not eligible for "active" uses (OS 2-1).

It is a very steep slope without public access. Note, ROW abandonment of Towne Centre Drive with Towne Centre View project.







2. Please <u>update the proposed zoning</u> on PUD managed lands east of I-805 (aka, "Pueblo Lands Central and South").

   Please zone OC 1-1, OP 2-1, or AR, rather than IL 2-1 –
   Concur with Land Use Designations on p 33

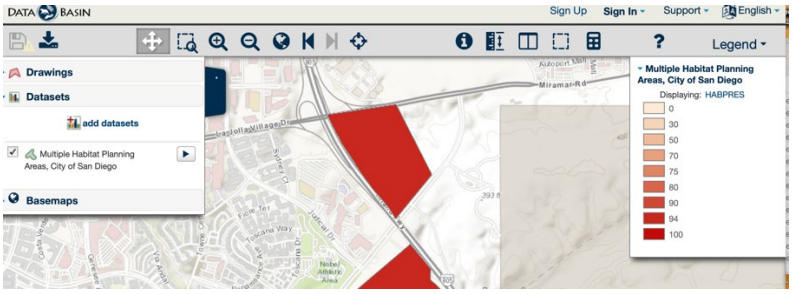
Note, the current zoning is RS 1-14, which is not appropriate. However, these properties at the end of the Miramar runway should not be upzoned for industry.

OC/OP/or AR better reflect the current and future conditions, as well as the best use of these lands.

These parcels are designated open space in the current 1987 University Community Plan as part of land "retained under Navy Fee Ownership due to overflight constraints." (Univ Cmty Plan, 222).
Both are in the MCAS Miramar Airport Influence Zone (TZ) and 65+decibel zone.
In 1994, Public Utilities Dept acquired the properties for use in its "Clean Water Program" as part of a land exchange between the City of San Diego and the Navy.
The Clean Water facilities are completed or under construction today on the adjoining Pueblo lands to the north. These include the locations of the North City Water Reclamation Plant and PURE Water facilities – under construction.
*The Pueblo Central and South parcels, south of Miramar Rd/LJ Village Drive, have been "**held for 'mitigation purposes'**" as **"excess" property** "**not needed for future City facilities**." (see, Office of the Mayor, 2012,).*[i]

Note: Also, the Pueblo Lands North parcel (north of Nobel) is 100% conserved MHPA land.

IL 2-1 Zoning for this parcel in particular is not appropriate or consistent with MSCP

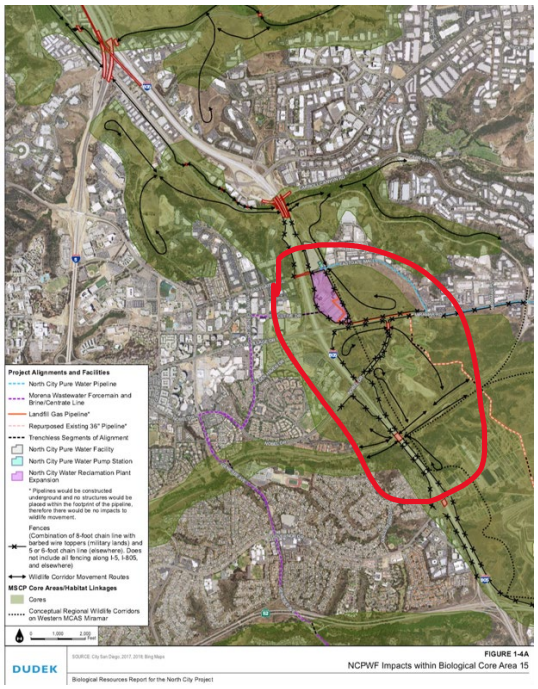


Source Data Basin, MHPA Lands, City of San Diego

Pueblo Lands South parcel is also being used for habitat mitigation [see PURE Water EIR]

Both parcels are part of the MSCP identified wildlife corridors that connect with MCAS Miramar and Peñasquitos.

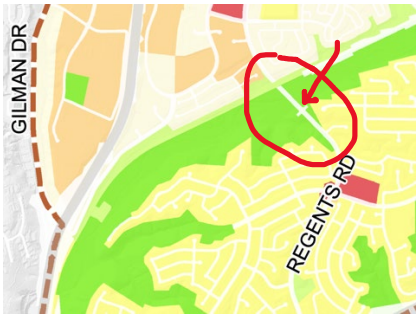
[See North City Pure Water EIR, 2018, figure 1-4A below]



3. Please update Proposed Zoning Map to remove the "Regents Road ROW Shadow" in Rose Canyon Open Space Park.

See number 3 on the map at the top and below.

This should be a universal correction. It has been completed for most of the original base maps used in the update (THANK YOU!). Here is one further (and hopefully final) location where it still appears.



4. Please update Zoning on the 15 acre "Dinosaur Park Open Space"

See number 4 on the map at the top.

These lands are managed by PUD as watershed and mitigation lands.

Community /UCPG votes going back to early 2000s support dedication as open space.

Update to OP/AR?

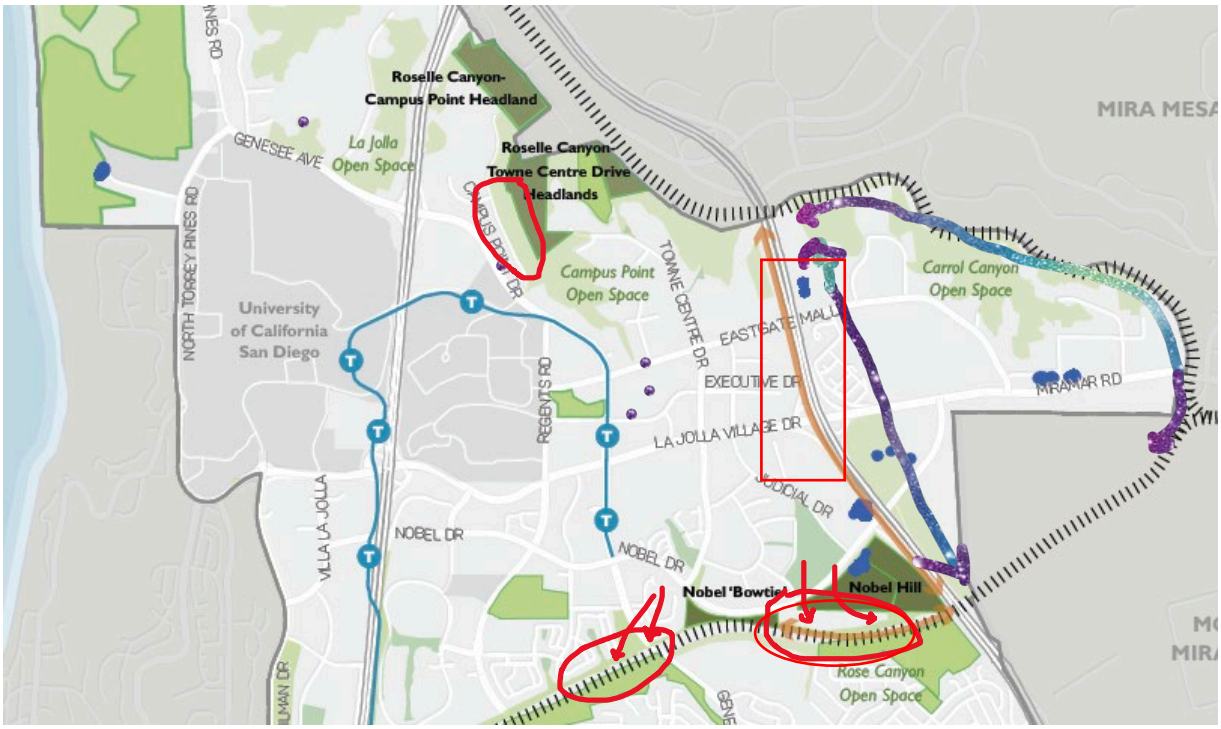
Other issues with the Proposed Zoning Map:

The color gradient is unclear for several types of zones:

Open Space Color Gradient: Can you please provide a **clearer color gradient** to distinguish among the **zoning designations on open space lands** (e.g., east of 805 in Miramar area). It is difficult to distinguish which zone is which.

RMX Color Gradient: Can you please provide a **clearer color gradient** to distinguish among the different RMX zones? It is difficult to distinguish which zone is which.

II. Corrections to Figure 29: University Community Open Space, p. 143



1. Please correct the base map to show dedicated open space accurately.

Note: The base map for Figure 29 is NOT up to date.

It does not include / reflect the dedicated open space/park lands in Rose Canyon and Campus Point/Roselle Canyon, which were dedicated by the city in 2012 and since.

Unfortunately, the same out of date base map is used for most of the Figures in the Draft.

Please update the base maps for the following Figures: 2, 3, 4, 5, 6, 13, 18, 20, 22, 23, 24, 26 and 27. Also, the Urban design maps for SUC, p. 87, 94, 97, etc...

The Base Map used for Proposed Zoning appears to be correct and up to date on this feature.

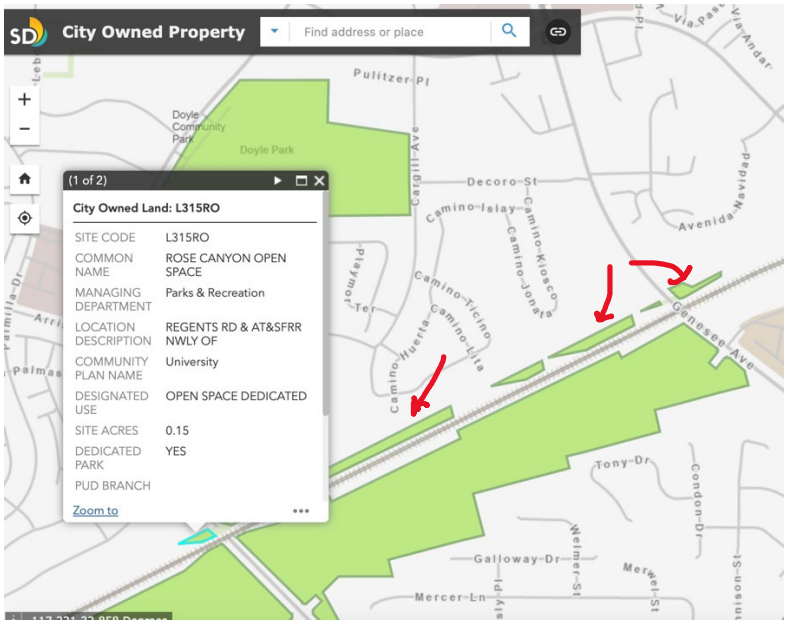
Here are the specific pieces that are not reflected in Figure 29 – or the other base maps.

a. Rose Canyon Open Space Lands

Three dedicated parcels on the north side of Rose Canyon are missing from Figure 29.

Please correct Figure 29 base map to reflect the current conditions (since 2012).

- Rose Canyon parcels, north of tracks



- Lucera Open Space "corridors"

- Monarch property – east of Lucera

b. Campus Point Open Space

Please update Figure 29 to show **all** of the Campus Point Open Space lands.

Note, the parcel on the west slopes of Roselle Canyon, just east of Campus Point Drive, is not shown as

dedicated. See below.

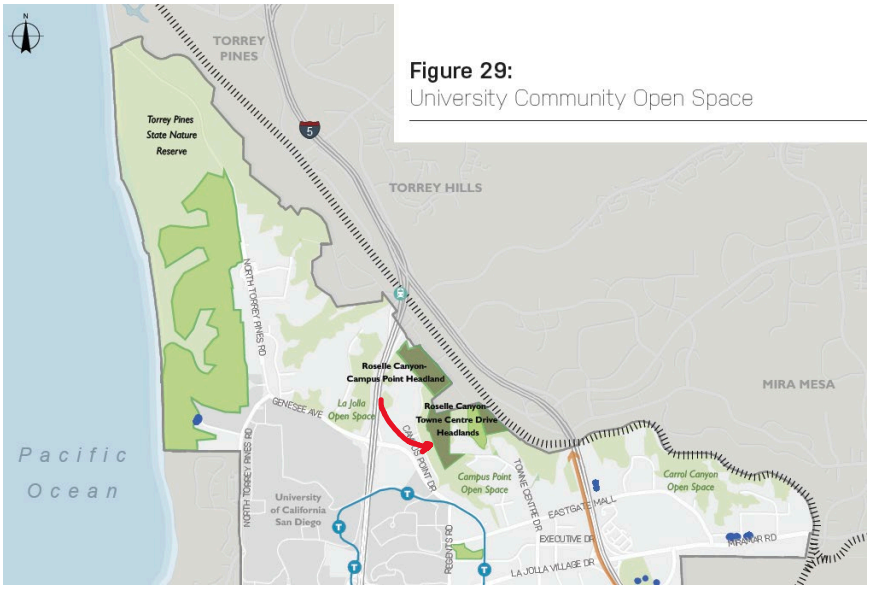
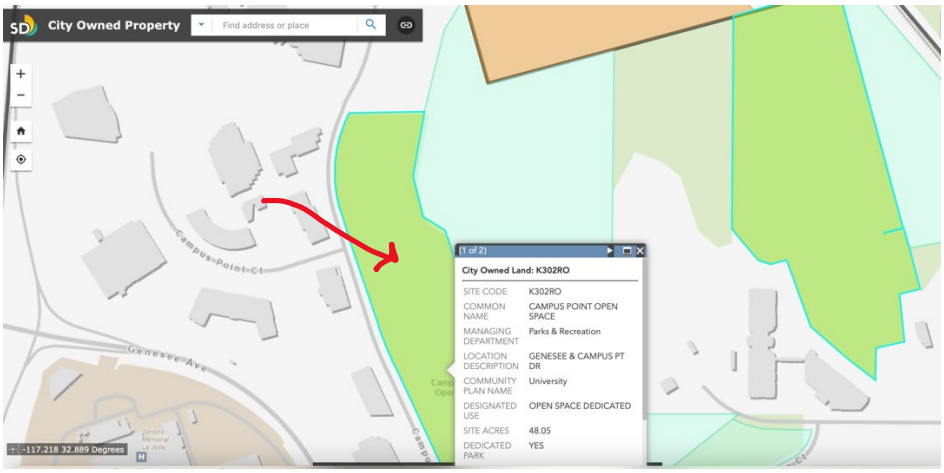


Figure 29:
University Community Open Space



c. Wildlife Corridors

Please correct/update one of the arrows for wildlife corridors on Figure 29.
The corridor running north/south along I-805 is misidentified.

Note: The functioning, MSCP identified wildlife corridors run on the lands **EAST of I-805**.

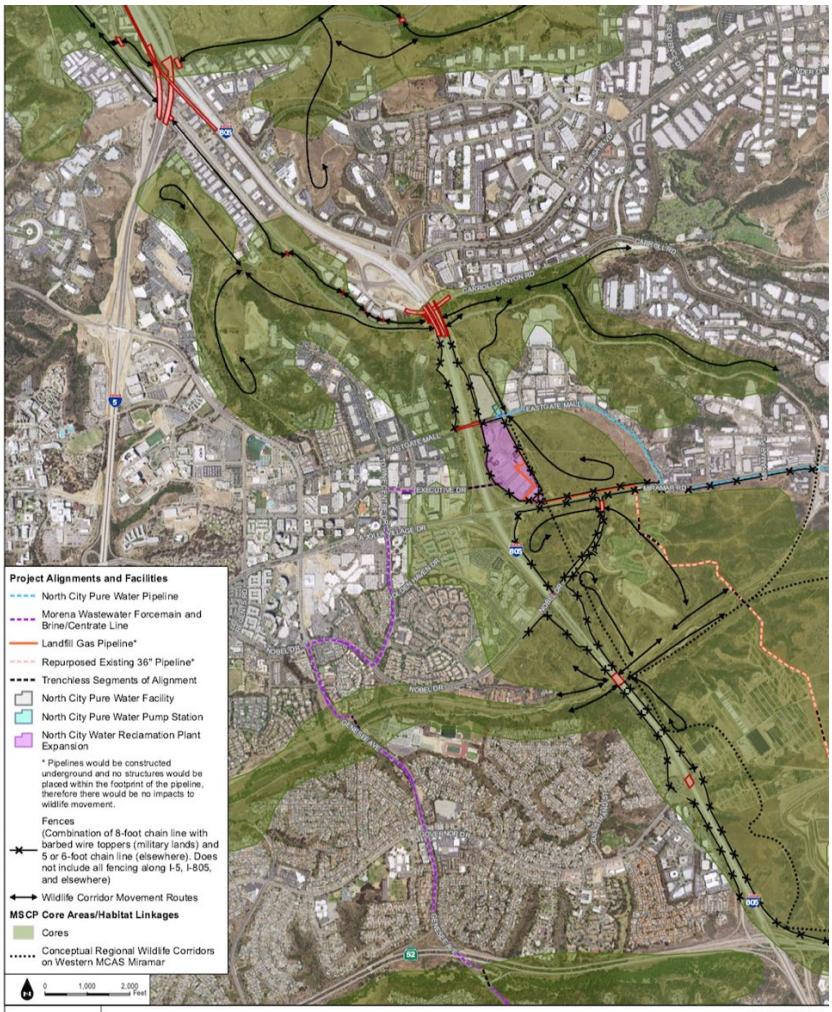
These are traced generally by the **SDGE utility easement**, Miramar Conservation Lands and
through **Soledad Canyon** on both sides of the RR tracks

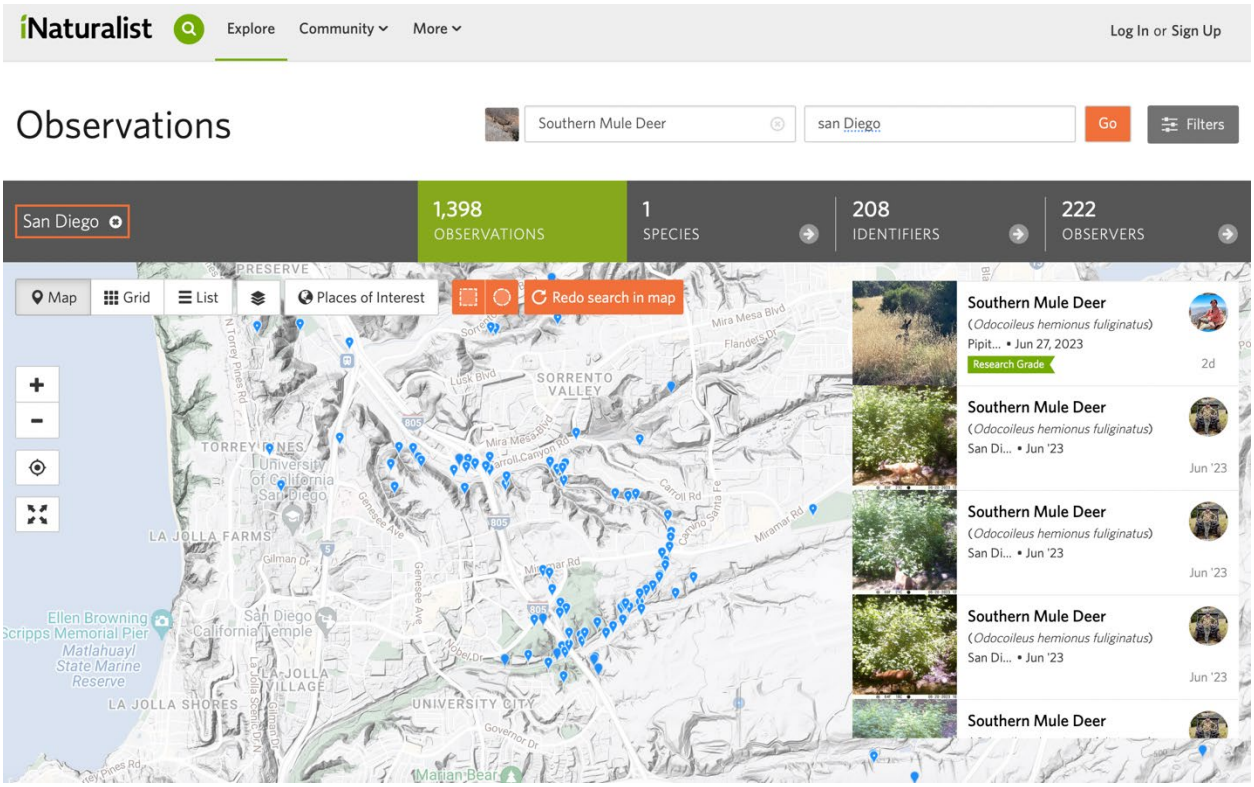
See blue arrows at the top.

Documentation:

i. City of San Diego Pure Water Project F-EIR, 2016;

ii. Research grade observations of Southern Mule Deer (MSCP covered species) iNaturalist (below)





Research Grade observations of Southern Mule Deer – iNaturalist, 2023

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[i] *Office of the Mayor, Report to City Council, Re "Contract Agreements with Capital Power…" ca June, 2012.*

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SHOPCORE PROPERTIES

April 22, 2024

Coby Tomlins
City of San Diego Planning Department
9485 Aero Drive, M.S. 413
San Diego, CA 92123

RE: Support for March 2024 Draft of University Community Plan Update

Dear Ms. Tomlins,

ShopCore Properties owns and operates The Shops at La Jolla Village, a collection of retail establishments, restaurants and services located at 8801-8879 Villa La Jolla Drive in the University Community Planning Area. We have followed the Community Plan Update process for the past several years and are writing to express our support for the recently released March 2024 draft.

Our property is proximate to the Nobel Drive Trolley Station, and the area around this transportation infrastructure is the perfect place to increase the intensity of walkable land uses. The March 2024 draft provides a framework to redevelop underutilized shopping centers like the Shops at La Jolla Village into vibrant mixed-use projects that provide a range of new jobs and homes. The plan will help the City fulfill its climate action goals, support affordable housing and maximize our region's $2 billion investment in the Blue Line Trolley.

Thank you for all the hard work and congratulations on reaching a draft that is finally ready for consideration by the Planning Commission and City Council. We look forward to this plan's approval and for the future of the University community.

Sincerely,

DocuSigned by:
Scott Miller
08DFEDBEE6F449...
ShopCore Properties

CC:
Mayor Todd Gloria
Councilmember Joe LaCava
Councilmember Kent Lee
Tait Galloway, Deputy Planning Director

DocuSign

Certificate Of Completion

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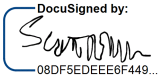
Scott Miller smiller@shopcore.com VP - Development Shopcore Security Level: Email, Account Authentication (None)	DocuSigned by:  08DF5EDEEE6F449... Signature Adoption: Drawn on Device Using IP Address: 64.203.212.122 Signed using mobile	Sent: 4/26/2024 2:48:05 PM Viewed: 4/26/2024 2:50:55 PM Signed: 4/26/2024 2:50:58 PM

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Envelope Summary Events	Status	Timestamps
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Completed	Security Checked	4/26/2024 2:50:58 PM

Payment Events	Status	Timestamps

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

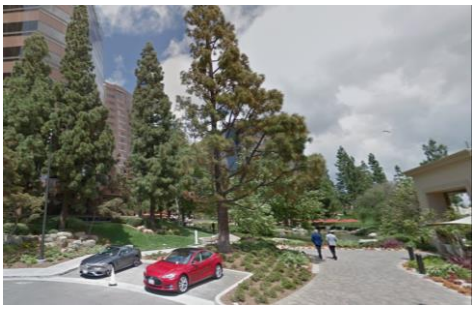
Americana @ Brand in Glendale, CA

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 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

Amazon Obidos, corner of Mercer & Terry, Seattle

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 <u>average</u> 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: U*rban 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 of 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 <u>average</u> 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.

Review of University City Community Plan Update Draft Mobility Technical Report

dated March 2024 – (review conducted April 2024 by Charles Frasier(frasierf@ix.netcom.com))

The Mobility Technical Report summarizes the physical and operational conditions of the planned mobility system outlined in the University Mobility Element. This report is one component of the University Community Plan Update, identifying the planned mobility improvements culminating with an analysis of all travel modes under the proposed plan horizon year of 2050.

The Proposed Plan is a strategy to address existing and forecast deficiencies related to the transportation system within the University community. It also strives to improve personal mobility through a balanced, multimodal transportation network, which supports the updated land use vision for University and aligns with the City's General Plan, Blueprint SD, and Climate Action Plan (CAP). The mobility system is comprised of roadway and freeway system, pedestrian and bicycle infrastructure, and public transit.

Analysis Methodology

Appendix A Existing Conditions Report describes the methodology used to determine the study area and analyze the transportation system for the University community. Since the adoption of the 2008 California Complete Streets Act (AB 1358), the City of San Diego has employed multimodal analysis procedures to assess mobility needs for pedestrians, cyclists, and transit users. **Analysis of the existing pedestrian, bicycle, transit, and vehicular system can be found in Appendix A.**

Vehicle Miles Traveled – SB 743 Analysis Senate Bill 743 (SB 743) was signed into law in September 2013, modifying the existing California Environmental Quality Act (CEQA) by removing auto delay, level of service (LOS), parking and other vehicular capacity measures as metrics of transportation system impacts for mixed-use, infill or transit- oriented development projects. Vehicle miles traveled (VMT) is considered the new analysis metric used to measure transportation impacts and must be incorporated by July 1, 2020, statewide. VMT reflects the land use type, intensity, and location in relation to the capacity and roadway connectivity of the transportation network. It is also influenced by the availability and quality of multimodal facilities, and system operations. VMT is metric that measures the number of vehicle trips generated and the length or distance of those vehicle trips. For transportation analysis, VMT is generally expressed in VMT per capita for a typical weekday. VMT does not directly measure traffic operations but instead measures the efficiency of the transportation system and is expressed as a function of population or employment.

Th**e VMT assessment for the University Community Plan Update, circa 2050, is discussed in Appendix B – Blueprint SD, University CPU, and Hillcrest FPA Vehicle Miles Traveled (VMT) Analysis.**

Roadway segments were assigned Level of Service (LOS) ratings of A through E as shown in Appendix A Table 2-16. LOS rating E is considered to be a roadway's capacity. Average Daily Traffic (ADT) volumes exceeding LOS E are given LOS rating F. Threshold for Determination of a Significant Transportation VMT Impact are shown in Appendix B Table 3-1. **Projects with an LOS grade of F**

exceed these thresholds and would have a significant adverse California Environmental Quality Act (CEQA) transportation impact.

Results

This review only addresses the results of the Roadway Segment Analyses for Governor Drive.

Governor Drive functions as a two-way east-west, 4-lane Major Arterial with raised medians and a curb-to-curb width of approximately 68-80 feet. Governor Drive is lined with sidewalks and curbs on both sides of the street for the entire length of the street. Parallel parking is available on both sides of the street along most segments of the roadway west of Gullstrand Street. Class II bike lanes (no buffer) are partially present on both sides of the street between Genesee Avenue and Gullstrand Street. The posted speed limit is 35 mph. Access to I-805 is provided at the eastern terminus of Governor Drive. Existing conditions Average Daily Traffic (ADT) volumes for the roadway segments were provided by Accurate Video Counts Inc and measured in April and May 2015.

The University CPU plans to reduce the number of travel lanes from a 4-lane Major Arterial to a 2-lane Major Arterial on Governor Drive (West End to Greenwich Drive) to create a Complete Street consistent with City goals in the General Plan, CAP, Vision Zero, and Complete Streets Policy to encourage walking, biking, and taking transit. The plan includes continuous buffered bike lanes along Governor Drive, enhanced pedestrian and intersection treatments, and traffic calming measures, while maintaining on-street parking. Other improvements include a protected intersection at is found to be Genesee Avenue and Governor Drive. University CPU plan Average Daily Traffic (ADT) volumes for the roadway segments were determined from SANDAG's Series 14 Activity Based Model (ABM2+). An assumption of the analysis revealed by the figure in the executive summary of Appendix A is that there will be no growth of single occupancy vehicles (SOVs) from existing conditions to the University CPU plan conditions.

Table 7-4 of Appendix A shows the Existing Conditions Summary of the Roadway Segment ADT Based Analysis. From Regents Road to the I-805 SB Ramps, **Governor Drive is found to have a LOS E Capacity of 40,000 with an Average Daily Traffic (ADT) volume of 16,796 to 19,737. The v/c Ratio calculated by dividing the ADT volume by roadway segment's capacity is found to be 0.420 to 0.493 resulting in an <u>acceptable</u> Level of Service (LOS) rating of B.**

Table 3-11 of the Draft Mobility Technical Report shows the Roadway Segment Analysis – Proposed Plan Conditions Analysis. From Regents Road to the I-805 SB Ramps, **Governor Drive is found to have a LOS E Capacity of 20,000 with an Average Daily Traffic (ADT) volume of 22,480 to 32,140. The v/c Ratio calculated by dividing the ADT volume by roadway segment's capacity is found to be 1.124 to 1.607 resulting in an <u>unacceptable</u> Level of Service (LOS) rating of F.**

(The Plan v/c ratio is more than double the existing ratio due, in part, to the presence of traffic lights along the road segment.)

Because the analysis assumes that there will be no growth in SOVs from existing conditions to the University CPU plan conditions, the results of the plan analysis are applicable to the existing conditions if Governor Drive were, tomorrow, suddenly converted from a 4-lane Major Arterial to a 2-

lane Major Arterial with continuous buffered bike lanes, enhanced pedestrian and intersection treatments, and traffic calming measures, and a protected intersection at Genesee while maintaining on-street parking.

The conclusion to be drawn from the Mobility Analysis is that converting Governor Drive from a 4-lane Major Arterial to a 2-lane Major Arterial with continuous buffered bike lanes <u>will have a significant adverse California Environmental Quality Act (CEQA) transportation impact</u> according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report.

April16, 2024

To: Nathen Causman

I have lived in University City since 1976, 48 years.

Our new community plan calls for changing Governor Drive from 2 lanes to one lane. Governor Drive needs to remain 2 lanes. It is our life-line into & out of University City--it runs all the way through our community, from east to west. Governor Drive is already congested near Genessee Ave. because of Standley Middle School & near Spreckles Elementary School, especially at school start times & dismissal times when parents are dropping off & picking up their children.

U. C. is surrounded by canyons. If Governor Drive is cut down to one lane, residents would not be able to get out/escape & be safe if there is a canyon fire. Governor Drive is also how residents access Health Care. From Governor Drive, patients go north on Genessee to get to Scripps & UCSD. It would take residents much longer to reach emergency rooms. And with the new congestion, ambulances would not reach people on time.

When new apartments are built at Regents Rd. & Governor Drive & at Genessee Ave. & Governor Drive, developers need to build a 2 car garage or a 2 car carport for every apartment. The plan is for 572 apartments at the Regents Rd./ Sprouts shopping center. Three people, who all have cars, will live in each apartment which means 1716 new renters will live there--it will also add 1716 cars. This will further congest Governor Drive. Cars will also fly down Regents Road in the morning & all day. The city will have to install a signal on Pennant Way & Regents Rd. before residents move into these apartments, otherwise homeowners will not be able to turn west on Pennant Way to get to their homes. That intersection is already dangerous & with 1,716 additional cars it will be treacherous. This proposal to add apartments without off-street parking does not make sense.

It will also take away our parking on these 2 corners because new renters will park in the shopping centers on these corners. This will take away our access to VONS, Rite Aid & Sprouts. Please do not take away our access to food & medicine—that is not the right thing to do.

Sincerely,

Jan Devens

Jan Devens

From:	Kristi Bascom
To:	SD Council Committee
Cc:	PLN University Community Plan Update; Lukes, Suchitra
Subject:	[EXTERNAL] Comments on Land Use and Housing Agenda Item #6 (6/13/2024 meeting)
Date:	Wednesday, June 12, 2024 5:23:28 PM
Attachments:	image001.png SMW-FRC UCP letter to LU&H Committee 6.12.2024.pdf

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Honorable Councilmembers,

On behalf of our client, Friends of Rose Canyon, please accept the attached comments on the Land Use and Housing Committee's consideration of the University Community Plan Update (Item #6 on your 6/13/2024 agenda). These comments had been provided previously on the Draft Blueprint (March 2024), to the Planning Commission for the 5/30/2024 public hearing, and are provided again for this Committee's consideration before the UCP is reviewed by the full City Council next month.

Kind regards,
Kristi Bascom

Kristi Bascom
Urban Planner
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office: 415/552-7272 x 202 | direct: 925/872-6327
www.smwlaw.com | A San Francisco Green Business

From: Jeff Dosick
To: Alo, Leo; Trom, Philip; PLN University Community Plan Update; Chris Nielsen; Andrew Wiese; Burton, Zach
Cc: Hauser, Everett; Jeff Dosick
Subject: [EXTERNAL] U.C. Plan Update Draft Mobility Existing Functional Classification
Date: Tuesday, June 11, 2024 11:49:07 AM
Attachments: image.png
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The two major East/West Streets, Eastgate Mall and Governor Dr. from Genesee heading East have again been incorrectly labeled Class II.

This needs to be corrected. These heavily traffic roads in rush hour no longer are safe for bicycle commuters, and they must be properly labeled in their current condition.
Without doing this now, the **immediate future priorities** we need for mobility to work, will be lost.

EASTGATE MALL

Table 3-7 Planned Bicycle Classification Modifications

Roadway	Segment	Existing Functional Classification	Planned Classification Designation	Implementation Category
Arriba St	Palmilla Dr to Regents Rd	Class II	Class IV (One Way)	Repurposing of public right-of-way
Arriba St	Regents Rd to Cargill Ave	N/A	Class III	Repurposing of public right-of-way
Bothe Av	Rose Canyon End to Stresemann St	N/A	Class III	Repurposing of public right-of-way
Callan Rd	N Torrey Pines Rd to Torreyana Rd	N/A	Class III	Repurposing of public right-of-way
Campus Point Dr	North End to Genesee Ave	N/A	Class IV (Two Way)	Repurposing of public right-of-way
Cargill Ave	Nobel Dr to Arriba St	N/A	Class III	Repurposing of public right-of-way
Costa Verde Blvd	La Jolla Village Dr to Nobel Dr	N/A	Class II (Buffered)	Repurposing of public right-of-way
Decoro St	Cargill Ave to Genesee Av	N/A	Class III	Repurposing of public right-of-way
Eastgate Ml	Regents Rd to Genesee Ave	N/A	Class II (WB) / Class IV (One-Way) (EB)	Repurposing of public right-of-way
Eastgate Ml	Genesee Ave to Judicial Dr	Class II	Class IV (One Way)	Dedication of 2 ft
Eastgate Ml	Judicial Dr to I-805 Overpass	Class II	Class II (WB) / Class IV (Two-Way) (EB)	Repurposing of public right-of-way
Eastgate Ml	I-805 Overpass to Olson Dr	Class II	Class IV (Two Way) (EB)	Repurposing of public right-of-way

U.C. Draft Plan June

Table 4: Planned Bicycle Classifications Modifications			
Roadway	Segment	Existing	Planned Classification Designation
Arriba St	Palmilla Dr to Regents Rd	Class II	Class IV (One Way)
Arriba St	Regents Rd to Cargill Ave	N/A	Class III
Bothe Av	Rose Canyon End to Stresemann St	N/A	Class III
Callan Rd	N Torrey Pines Rd to Torreyana Rd	N/A	Class III
Campus Point Dr	North End to Genesee Ave	N/A	Class IV (Two Way)
Cargill Ave	Nobel Dr to Arriba St	N/A	Class III
Costa Verde Blvd	La Jolla Village Dr to Nobel Dr	N/A	Class II (Buffered)
Decoro St	Cargill Ave to Genesee Av	N/A	Class III
Eastgate Ml	Regents Rd to Genesee Ave	N/A	Class II (WB) / Class IV (One-Way) (EB)
Eastgate Ml	Genesee Ave to Judicial Dr	Class II	Class IV (One Way)
Eastgate Ml	Judicial Dr to I-805 Overpass	Class II	Class II (WB) / Class IV (Two-Way) (EB)
Eastgate Ml	I-805 Overpass to Olson Dr	Class II	Class IV (Two Way) (EB)
Eastgate Ml	Olson Dr to Miramar Rd	N/A	Class IV (Two Way) (EB)
Executive Dr	Regents Rd to Judicial Dr	N/A	Class IV (One-Way)
Executive Wy	Executive Dr to La Jolla Village Dr	N/A	Class IV (Two-Way)
Genesee Ave	N Torrey Pines Rd to I-5 NB Ramps	Class II	Class IV (One Way, Two Lanes)
Genesee Ave	I-5 NB Ramps to Scripps Hospital Drwy	Class II	Class II (SB) / Class I (One Way) (NB)
Genesee Ave	Scripps Hospital Drwy to SR-52 EB Ramps	Class II	Class IV (One-Way)
Gilman Dr	La Jolla Village Dr to La Jolla Colony Dr	Class II	Class IV (One-Way)
Governor Dr	Stresemann St to Genesee Ave	N/A	Class II (Buffered)
Governor Dr	Genesee Ave to Kantor St	Class II	Class II (Buffered)
Governor Dr	Kantor St to I-805 NB Ramps	Class III	Class II (Buffered)

Below the red Circles show where the Class II bike lane has disappeared. It used to be here all the way to Genesee!
Rush hour traffic now at this intersection of Genesee wanting to get to I-5, (years ago the bike lane on the north side of the road existed).
Other sections of the road have had turn lanes added, using the bike lanes space.

GOVERNOR DR. from Genesee going East

Table 4: Planned Bicycle Classifications Modifications			
Roadway	Segment	Existing	Planned Classification Designation
Arriba St	Palmilla Dr to Regents Rd	Class II	Class IV (One Way)
Arriba St	Regents Rd to Cargill Ave	N/A	Class III
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Callan Rd	N Torrey Pines Rd to Torreyana Rd	N/A	Class III
Campus Point Dr	North End to Genesee Ave	N/A	Class IV (Two Way)
Cargill Ave	Nobel Dr to Arriba St	N/A	Class III
Costa Verde Blvd	La Jolla Village Dr to Nobel Dr	N/A	Class II (Buffered)
Decoro St	Cargill Ave to Genesee Av	N/A	Class III
Eastgate Ml	Regents Rd to Genesee Ave	N/A	Class II (WB) / Class IV (One-Way) (EB)
Eastgate Ml	Genesee Ave to Judicial Dr	Class II	Class IV (One Way)
Eastgate Ml	Judicial Dr to I-805 Overpass	Class II	Class II (WB) / Class IV (Two-Way) (EB)
Eastgate Ml	I-805 Overpass to Olson Dr	Class II	Class IV (Two Way) (EB)
Eastgate Ml	Olson Dr to Miramar Rd	N/A	Class IV (Two Way) (EB)
Executive Dr	Regents Rd to Judicial Dr	N/A	Class IV (One-Way)
Executive Wy	Executive Dr to La Jolla Village Dr	N/A	Class IV (Two-Way)
Genesee Ave	N Torrey Pines Rd to I-5 NB Ramps	Class II	Class IV (One Way, Two Lanes)
Genesee Ave	I-5 NB Ramps to Scripps Hospital Drwy	Class II	Class II (SB) / Class I (One Way) (NB)
Genesee Ave	Scripps Hospital Drwy to SR-52 EB Ramps	Class II	Class IV (One-Way)
Gilman Dr	La Jolla Village Dr to La Jolla Colony Dr	Class II	Class IV (One-Way)
Governor Dr	Stresemann St to Genesee Ave	N/A	Class II (Buffered)
Governor Dr	Genesee Ave to Kantor St	Class II	Class II (Buffered)
Governor Dr	Kantor St to I-805 NB Ramps	Class III	Class II (Buffered)

Table 3-7 Planned Bicycle Classification Modifications

Roadway	Segment	Existing Functional Classification	Planned Classification Designation	Implementation Category
Arriba St	Palmilla Dr to Regents Rd	Class II	Class IV (One Way)	Repurposing of public right-of-way
Arriba St	Regents Rd to Cargill Ave	N/A	Class III	Repurposing of public right-of-way
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Campus Point Dr	North End to Genesee Ave	N/A	Class IV (Two Way)	Repurposing of public right-of-way
Cargill Ave	Nobel Dr to Arriba St	N/A	Class III	Repurposing of public right-of-way
Costa Verde Blvd	La Jolla Village Dr to Nobel Dr	N/A	Class II (Buffered)	Repurposing of public right-of-way
Decoro St	Cargill Ave to Genesee Av	N/A	Class III	Repurposing of public right-of-way
Eastgate Ml	Regents Rd to Genesee Ave	N/A	Class II (WB) / Class IV (One-Way) (EB)	Repurposing of public right-of-way
Eastgate Ml	Genesee Ave to Judicial Dr	Class II	Class IV (One Way)	Dedication of 2 ft
Eastgate Ml	Judicial Dr to I-805 Overpass	Class II	Class II (WB) / Class IV (Two-Way) (EB)	Repurposing of public right-of-way
Eastgate Ml	I-805 Overpass to Olson Dr	Class II	Class IV (Two Way) (EB)	Repurposing of public right-of-way
Eastgate Ml	Olson Dr to Miramar Rd	N/A	Class IV (Two Way) (EB)	Repurposing of public right-of-way
Executive Dr	Regents Rd to Judicial Dr	N/A	Class IV (One-Way)	Dedication of 10 ft
Executive Wy	Executive Dr to La Jolla Village Dr	N/A	Class IV (Two-Way)	Repurposing of public right-of-way
Genesee Ave	N Torrey Pines Rd to I-5 NB Ramps	Class II	Class IV (One Way, Two Lanes)	Repurposing of public right-of-way
Genesee Ave	I-5 NB Ramps to Scripps Hospital Drwy	Class II	Class II (SB) / Class I (One Way) (NB)	Coordination with abutting property owners and repurposing of public right-of-way
Genesee Ave	Scripps Hospital Drwy to SR-52 EB Ramps	Class II	Class IV (One-Way)	Repurposing of public right-of-way
Gilman Dr	La Jolla Village Dr to La Jolla Colony Dr	Class II	Class IV (One-Way)	Repurposing of public right-of-way
Governor Dr	Stresemann St to Genesee Ave	N/A	Class II (Buffered)	Repurposing of public right-of-way
Governor Dr	Genesee Ave to Kantor St	Class II	Class II (Buffered)	Repurposing of public right-of-way

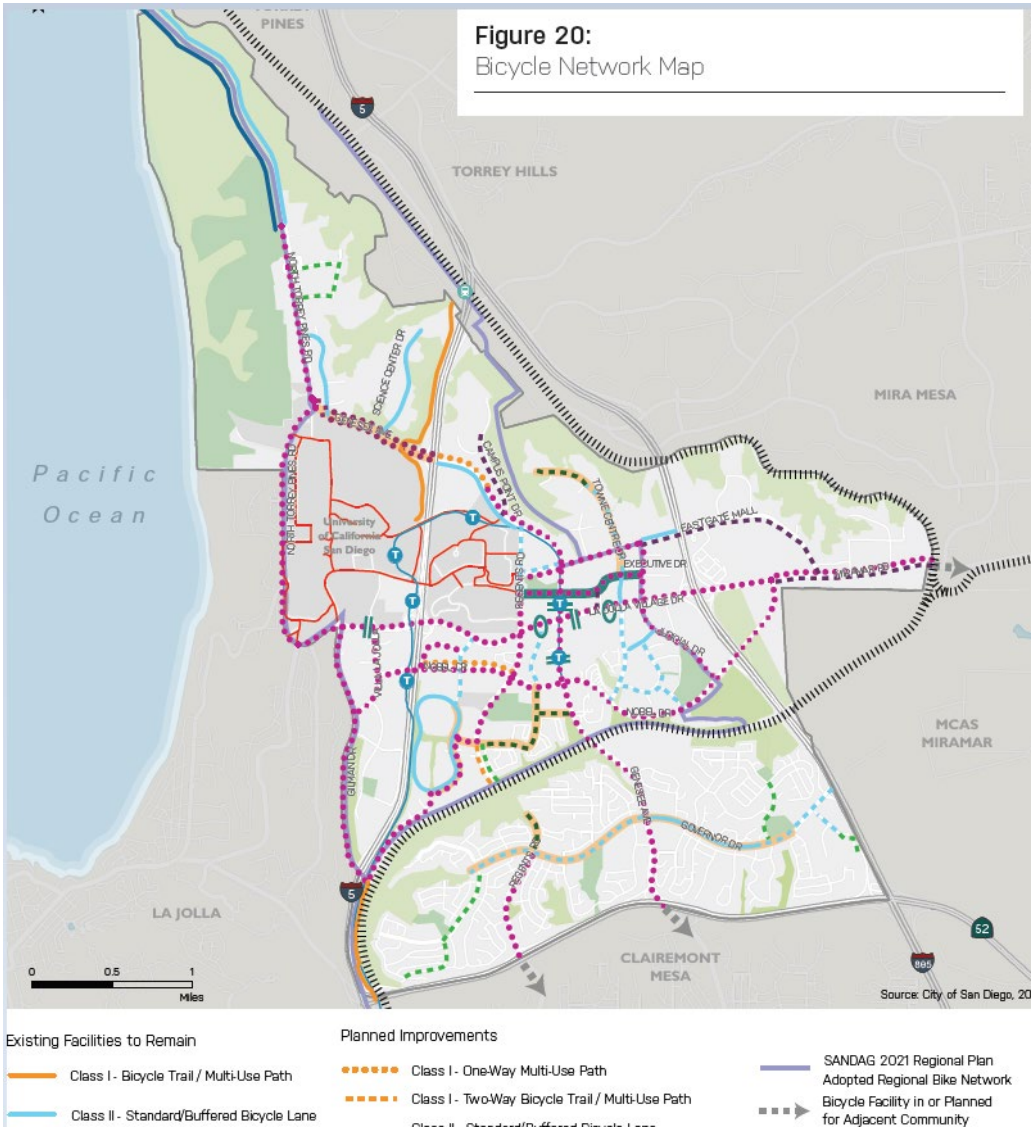
DRAFT

Governor Dr. looking West from the South side of the road (Current)

Looking East from near Genesee (Current)

Google 2011 image looking East (Note: Class II bike lane existed!)

Solid lite blue line falsely labeling existing Class II on Governor
All the way to Kantor on both the north/south side of Governor dangerous road bike lane gaps appear and then disappear.
All of a sudden the car and bike are sharing the same space in the road.
Unsafe conditions



TIA,
Jeff Dosick
4395 Rous St.

From: Lorna Alcala
To: PLN University Community Plan Update
Subject: [EXTERNAL] UC plan
Date: Sunday, June 9, 2024 10:53:31 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Please consider the quality of life for the current residents of University City. The plan update will exacerbate problems that already exist with traffic congestion and inadequate infrastructure.

I am opposed to the University Community Plan Update, which proposes to more than double the population in UC.

The overall density proposed in the Plan Update should be reduced because the Plan Update does not provide enough park space or guaranteed upgrades to transportation and emergency services that would be needed to support the proposed densities.

Densities at shopping centers in residential areas should be reduced to 54 dwelling units/acre, and height limits should be 50 feet or less. Setbacks at these shopping centers should be increased to 30 feet, and required commercial space should be 80% of the ground floor area.

SDRs should be modified to ensure that the public has access to all new public spaces, and these areas must be increased.

The University Plan area should be exempt from the Complete Communities program now that the Plan has been updated to allow significantly higher levels of density.

Lorna and Stephen Alcala

From: Ana Minvielle-Blakesley
To: PLN University Community Plan Update
Subject: [EXTERNAL] Don't change University City
Date: Sunday, June 2, 2024 6:11:22 PM

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There are hundreds of apartments near UTC—rents have only increased. Lower rents resulting from an increase in density is *never* going to happen.

Your plans will ruin University City. Traffic is already a nightmare. Density is horrible.

Leave University City alone, please!

Regards,
Ana Minvielle and Stephen Blakesley

From:	Kristi Bascom
To:	DSD PlanningCommission; PLN University Community Plan Update
Cc:	Lukes, Suchitra
Subject:	[EXTERNAL] Comments on 5/30/2024 PC agenda Item #3
Date:	Thursday, May 30, 2024 11:49:47 AM
Attachments:	image001.png UCP Planning Commission comment letter 5.30.2024.pdf

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Honorable Planning Commissioners,

On behalf of our client, Friends of Rose Canyon, please accept the attached comments on the Commission's consideration of the University Community Plan update. Many of the comments had been provided previously on the Draft UCP Update (March 2024), and are provided again for your consideration as you are making a recommendation on the UCP to the City Council.

Kind regards,
Kristi Bascom

Kristi Bascom
Urban Planner
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396 Hayes Street
San Francisco, CA 94102-4421
office: 415/552-7272 x 202 | direct: 925/872-6327
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From:	Alan Lutze
To:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com; PLN_PlanningCEQA
Subject:	[EXTERNAL] Vons and Sprouts Shopping Centers
Date:	Wednesday, May 29, 2024 10:01:51 AM

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To Whom It May Concern

I read that you are in favor of walkable neighborhoods. I live in South University City and for me we have that now. I can walk to the Vons or Sprouts shopping centers on Governor Drive. If I am not buying a lot of groceries I actually prefer walking and do this often. But I am concerned about the plans to redevelop the Vons and Sprouts centers to add hundreds of housing units without any requirement to keep the grocery stores. On top of this Governor Drive would be converted to just one lane in each direction. This means all of those new residents would need to drive on a down sized Governor to head miles away to shop for food. On top of this I keep hearing that there is not any requirement to provide parking for all the new residences. Please don't destroy University City.

Alan Lutze

6421 Dennison St

San Diego, CA. 92122

From: Carlo Greco
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Monday, May 27, 2024 5:40:39 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comments to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre.

This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using

public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego’s public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It’s imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC’s Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs

to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Carlo Greco
3362 Tulane Ct
San Diego, CA 92122

From: Antonella Manetti
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Monday, May 27, 2024 5:33:04 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comments to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre.

This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using

public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego’s public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It’s imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC’s Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs

to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,
Antonella Manetti
3362 Tulane Ct
San Diego, CA 92122

From: Martina Greco
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Wednesday, May 29, 2024 4:21:45 PM

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Sincerely,

Martina Greco
3362 Tulane Ct
San Diego, CA 92122

From: Martina Greco
To: PLN_PlanningCEQA
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to University Community Plan Update Draft EIR
Date: Wednesday, May 29, 2024 4:20:06 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

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II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

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area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

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Sincerely,
Martina Greco
3362 Tulane Ct
San Diego CA 92122

From:	Reed Vickerman
To:	Lukes, Suchitra
Cc:	Quintero, Joaquin; Elizabeth Palmer; Amy Atencio; PLN University Community Plan Update; Galloway, Tait; Causman, Nathen; Rebecca Robinson Wood
Subject:	[EXTERNAL] RE: UCPC Enhanced Multi-Modal Path Proposal
Date:	Wednesday, May 29, 2024 3:32:45 PM

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Suckitra:

Please clarify if the proposed multi-modal path depicted on the attached map in the UCPU follows the streets in the Southpointe HOA above Gilman Drive and then heads down the slope to Caltran's property near the I-5 offramp (Figure 6, Page 50 of the UCPU)?

I am sure you have heard from others but, I want to make sure I understand what multi-modal means; is that pedestrians *and* bikes? If this is the proposed path, is it appropriate to be traversing narrow ***private*** streets that have ***no sidewalks***? The slope at the end is ***dangerously steep***. Southpointe actively discourages passage on this route due to the unsafe conditions. Is there a reason the planned bike/pedestrian path recently approved along Gilman is not the designated route?

Any information you could provide would be most helpful. How do you suggest the HOA best contribute to this discussion?

Thank you very much for your assistance!

Reed Vickerman
reed.vickerman@gmail.com
(858) 736-7751

From: Chuck Lane
To: PLN University Community Plan Update
Subject: [EXTERNAL] Regents Rd North planned park
Date: Wednesday, May 29, 2024 1:19:18 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

As a resident of the immediate neighborhood, I am generally in favor of this redevelopment. If I understand the text and photos on pages 128-129 of the draft plan, the city would demolish the traffic median and two paved lanes on the west side of the road to convert them to a park and playground. The two eastern lanes would be reconfigured into a two-way street without parking or only a few spaces at the north end. This plan is not optimal for a variety of reasons.

1. All water run-off during storms is channeled into that narrower street increasing the erosion risk to the canyon when the storm drain at the south end clogs (which it will frequently from litter left by visitors).
2. It removes vital parking needed by residents. The surrounding community was designed in the 70's when only a few families had a second car and renters were rarely more than 2-3 per unit. Today, the community is 55% renters with 3-4 per unit and 2-3 cars per unit - while the units only have 1-2 assigned parking spots. (The photo in the draft plan was obviously taken midday on a weekday when everyone had already commuted to class or work.)
3. The "linear" design of the park presents a very large interface between vehicular traffic and the play area of children. This is both unsafe for children venturing into traffic and unhealthy in terms of dust and emissions. It also ruins the stated aesthetic for appreciating nature by having cars circulating adjacent to the space.

For these reasons, I would like to petition for the consideration of an alternate plan that would address all of the issues above. Divide the space transversely rather than longitudinally.

1. Using a variety of drains and dispersion designs, storm water could be absorbed under the park area and generate minimal run-off directly into the canyon.
2. The north end of the area would retain the current design of 4 divided lanes with a median. The outer lanes would be striped for diagonal parking and the inner ones could be used for traffic circulation to the park. This would preserve at least half of the existing overnight parking for residents while providing some day-use only spots for visitors. (Campers, boats and other non-daily use vehicles would be prohibited.)
3. The interface between vehicle traffic and children playing would be reduced by at least 75% reducing: risk of accidents, pollution exposure of children and disruptions to enjoyment of the canyon environment.

I hope the planning group will consider my points for this space as well as any similar spaces that would benefit from the risk mitigation and improvement in experience that such changes would offer.

Regards,

Charles Lane

HOA VP

Playmor Terrace West

From: J Figueroa
To: PLN University Community Plan Update
Subject: [EXTERNAL] Support for the UTC Plan
Date: Wednesday, May 29, 2024 11:41:04 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

I wanted to express support for the plan to increase density in UTC. There are claims that doing so will cause harm to the community through increased traffic. However, these claims have no real backing given the simple reality of the recent direction of San Diego and University City.

Traffic will only be an issue if walking, cycling, and transit are non-competitive with cars. There have been very clear efforts recently to vastly improve the cycling infrastructure, which I believe are the most valuable alternative to driving within University City, particularly through e-bikes.

To be frank, most people in UTC are very capable of affording and using an e-bike. There's even a local bike shop, UCCyclery (shoutouts to Rudy), that will be more than happy to help you find the right one for you. You do not need a car to traverse within UTC. You can get groceries with a bike, go to a local restaurant with a bike, go to the mall and park it in the bike locker. Local doctor's appointments with a bike. Local dentist with a bike.

Cargo e-bikes are often designed with kids in mind. Having pets or a family is no reason not to ride a bike around here, and chances are kids and pets would enjoy that experience more than riding in a car!

You don't even need to be fit. The area is quite hilly, but e-bikes just solve that problem entirely.

Is the weather chilly sometimes? Sure, but now you can show off your nice coats and jackets year-round.

I'm sure traffic would increase. But only for those who choose to remain in their cars, rather than taking the clearly viable alternative, an e-bike.

I think my concern is that people need to realize that e-bikes are a great way to get around UTC. I try to do my part by riding around here in "normal-people" clothes, more casually. Signs and posters advertising them as a good choice over cars could help.

From:	Hunter Oliver
To:	Galloway, Tait
Cc:	Lukes, Suchitra; Alo, Leo
Subject:	[EXTERNAL] University City
Date:	Thursday, May 23, 2024 4:49:01 PM
Attachments:	2022-01-21 La Jolla Village Drive Sections (1).pdf

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Tait -

The draft University City Community Plan needs to reflect the ability for us to create a turn pocket into our land (NW quadrant of LJ Village & I-805) where our legal ingress egress is into our site through the bike lane. In the most recent draft, the bike lane is now shown on our side of the road and is shown as a one way Class IV lane. This would prohibit vehicular access to our site, which we obviously don't find acceptable. Our last planning document submitted to Ann and George is attached showing the potential for us putting in a deceleration lane with the ability to turn through the Class II bike lane. We need the plan to reflect the right for us to put in a decel lane and a turn pocket into both the primary and emergency ingress and egress access.

I left you a voicemail earlier this afternoon. Please let me know a good time to catch up.

Thank you,

Hunter Oliver
858-405-9846

From:	Zahns
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] University City
Date:	Tuesday, April 30, 2024 2:50:09 PM

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To Whom It May Concern

I have lived in UTC for 22 years and I fully support the following comments that must be seriously considered at the City of San Diego's University Community Plan Update Draft EIR (DEIR):

Sandra Zahn (5208 Renaissance ave., 92122)

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

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Regards,
Sandra Zahn 5208 Renaissance Ave SD, CA

From:	Robert Eisenman
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Tuesday, April 30, 2024 8:08:25 AM

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III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,

Robert Eisenman
4282 Robbins Street
San Diego CA 92122

From: Sanja Zlatanovic
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject: [EXTERNAL] Comments on the draft University Community Plan update
Date: Monday, April 29, 2024 11:22:05 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the University Square must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and

setbacks must be 30 feet from adjacent properties.

5. Development on any property designated “Community Village” in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Sincerely,
Sanja Zlatanovic

From: sarahcookart@aol.com
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comment on revised University Community Plan Update
Date: Monday, April 29, 2024 9:33:37 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS'

budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Sarah Anne Cook
4556 Benhurst Avenue, San Diego, CA 92122

From: Neha
To: PLN University Community Plan Update
Subject: [EXTERNAL] University City Community Plan-public comment
Date: Monday, April 29, 2024 8:51:16 PM
Attachments: University City_public comment_4_24.pdf

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hello,

I have been a resident of University City for over a decade, and have grown up in this community, attending the local middle and high schools here. I urge you to listen to my fellow community members as you consider the expansion of high density building projects that will significantly affect our thriving community.

Of the many things I have enjoyed living here, such as the community, and the people, the most important has been the access to so many vital resources. It is necessary for a thriving community to have access to stores that sell fresh produce, open community spaces, and the ability to easily access services such as pharmacies, coffee shops, grocery stores, the post office, the library, as well as public transit. Currently, residents already have access to all these resources, and for many, they are only a short walk or bike ride away.

It is clear that San Diego needs more housing, and critically, that it needs more housing which is accessible to the people that live and work here. However, I do not believe that building high density units in our existing marketplaces, or re-zoning existing family homes to allow developers to build high density housing is the solution. University City has already seen an increase in these types of high density developments, such as the newer apartments built at the UTC mall, or the Costa Verde shopping complex. These projects increased units, but did not add accessible housing units for young professionals or UCSD students as developers would like to tout, these ‘luxury’ apartments are priced so that they are still out of reach for most young adults in San Diego, even out of reach of a traditional two-income household of established professionals.

It should not be ignored that the University of California, San Diego is a business, and that it benefits hugely from increasing its base of undergraduate students, particularly undergraduate students that come from out of state, paying well over two times the tuition of in-state undergraduate students, and many of whom would be in need of additional housing. Should UCSD choose to expand their classes with undergraduate students who would require this additional housing, they should also be willing and able to accommodate them on their already expansive campuses and satellite properties.

Building more housing should not come at the expense of communities that are thriving and already include the key components that are needed for a healthy community such as a sense of belonging, the ability to gather in outdoor spaces, access to walk and exercise outside safely, and access to stores that sell affordable, healthy, fresh produce. Simply re-zoning communities, without regard to the actual impacts of new, high density building projects on the existing community members and community resources, or true impact on accessible housing will have a significantly negative, even devastating effect on our community.

As a resident of University City, located in one of the areas directly of focus for potential re-zoning and the allowance of high density building, and also as a young professional who is invested in the long term health of communities like University City, as well as other communities who are significantly more under-resourced and under-invested in San Diego, I urge you to reconsider the development plans that would increase high density units at the expense of our vital shopping centers, businesses, family homes, and thriving, well connected community, while at the same time failing to guarantee truly accessible housing units.

I appreciate your time and your consideration.

Thank you,

Neha Bharti, University City resident

From:	Marcio
To:	PLN University Community Plan Update; Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject:	[EXTERNAL] Comments on the University Community Plan Update.
Date:	Monday, April 29, 2024 8:30:52 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Thank you.
Respectfully,

Marcio and Claudia de Andrade

From: tinagrover@aol.com
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Monday, April 29, 2024 7:53:03 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS'

budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

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VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

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X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Tina Grover
6115 Radcliffe Drive

San Diego, CA 92122

From: Kacey Walker
To: PLN University Community Plan Update
Cc: CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject: [EXTERNAL] Comments on the University Community Plan Update
Date: Monday, April 29, 2024 7:48:12 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

I would like to make the following comments on the University City Community Plan Update.

1. The height limit for any future development at the three UC shopping centers (Sprouts shopping center on Governor, Vons shopping center on Governor, and Vons Shopping Center on Regents Rd) should be 40-50 feet with a setback of 30 feet from adjacent properties. The current height limit of 100 ft is excessive in these neighborhoods, given that no new facilities such as school, parks, or expanded roads/parking are planned in these areas.
2. The density at these shopping centers should be a max of 50 dwellings/acre for similar reasons.
3. Development on any property designated “Community Village” in the University Community Planning Area should maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use. These commercial facilities are extremely important for the livability of the communities.

Thank you,
Kacey Walker

From:	Dan Linder
To:	PLN_PlanningCEQA
Cc:	Gloria, Todd; CouncilMember Kent Lee; Tomlins, Coby; Galloway, Tait; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Stop reduction of Governor dr Lanes
Date:	Monday, April 29, 2024 6:20:14 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

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City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

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City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making

the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built
under the lenient guidelines of the Complete Communities Housing Solutions
program.

Dan Linder
6239 Radcliffe dr.
San Diego, CA 92122

From:	Milo Worsham
To:	PLN_PlanningCEQA
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava
Subject:	[EXTERNAL] University Community Plan Update Draft EIR (DEIR)
Date:	Monday, April 29, 2024 5:56:50 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern: Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

IV. IV. The Community-Preferred Alternative Plan Must Be Included in the Land

Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts : The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Milo Worsham
6254 Via Regla
San Diego CA 92122
858-449-0014

From:	Milo Worsham
To:	PLN_PlanningCEQA
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava
Subject:	[EXTERNAL] University Community Plan Update Draft EIR (DEIR)
Date:	Monday, April 29, 2024 5:56:49 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern: Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

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Milo Worsham
6254 Via Regla
San Diego CA 92122
858-449-0014

From: susan@susanworsham.com
To: PLN_PlanningCEQA
Cc: universitycitypeeps@gmail.com; Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; milo@miloworsham.com
Subject: [EXTERNAL] University Community Plan Update Draft EIR (DEIR)
Date: Monday, April 29, 2024 5:48:58 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

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IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that

alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

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Susan Worsham
6254 Via Regla, San Diego, CA 92122

From: Edward McGrath
To: PLN University Community Plan Update
Subject: [EXTERNAL] University City Community Plan Update
Date: Monday, April 29, 2024 5:21:45 PM

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I'm commenting specifically on the proposed changes to Governor Drive that are envisioned on page 20 of the Policy Planning Document, and detailed in the "mobility" section further on in that document. This is an excerpt from page 20: "Shopping centers in this area will be updated in design, form, and quality to add a greater mix of uses, including increased access to new homes in a mixed-use environment. Two linear parks along Regents Road and Governor Drive will offer new overlook areas to enjoy scenic canyon views. Governor Drive will be improved with traffic calming and buffered bike lanes so that residents can safely access key facilities in the area, including the various schools, recreation centers, and the University Community Branch Library".

There will be increased housing density and added retail outlets, while at the same time Governor Drive will lose one traffic lane in each direction. Did somebody forget that there are three schools on Governor Drive, two municipal pools, a recreation center, a playground and two athletic fields. Additionally, the high school is just to the north on Genesee, there is commuter traffic to and from the businesses off Greenwich Drive at the eastern end of Governor Drive, and there are both single-family homes and multi-family apartments all along Governor Drive, all of which use on-street parking.. Traffic is already heavily impacted (!) at certain times, but it appears that no one gave any thought to the effects these proposed changes to Governor Drive will have on the traffic patterns and operations of these many venues in the future.

It is not at all clear what problem(s) will be solved by reconfiguring Governor Drive, since San Diego is not Amsterdam, Brussels, Copenhagen or any of the other cities where bicycles are a useful form of transport. More power to fitness/sport riders, but here in UC we are bounded by steep hills and only the young or very fit older riders can successfully negotiate Genessee Avenue to the south or north. Most of San Diego is situated in similar terrain, with hills, streets broken up by canyons, and destinations spread out over large geographic areas. This is not "cycling as transport country". Be that as it may, the eastern segment of Governor Drive is wide open with good sight lines, and most of that end already has a bike lane. West of Genesee, riders can travel on Milliken Avenue between Radcliff Street and Regents Road, thereby avoiding Governor Drive altogether. Easy. If they can handle the hills and don't mind arriving at work all sweaty.

Further, ruining Governor Drive will result in vehicles spending more time idling in traffic, or trying to merge into a single lane, spewing more toxins into the atmosphere or using electricity which will put additional strain on the power grid. Oh, I forgot, everything will be "walkable urban villages". Get in trouble for leaving work early so you can waste an hour or two walking to pick up the kids at school, traipse home carrying their backpacks, then be too exhausted to cook dinner or do homework.

Why screw up a perfectly good road? Traffic on Governor Drive does not need to be

"calmed", and the residents already can "safely access key facilities" in the area. Since August of 2016 there have been 102 traffic accidents on Governor Drive, per the SDPD's records. Call it 7.5 years to today's date...that's 13.6 accidents per year or slightly more than one per month. In that same period there were 12 accidents attributed to violations of section 22350 of the vehicle code (Unsafe Speed/Basic Speed Law). Thus, if there were never any speeding on Governor Drive, 1.6 accidents per year would be eliminated. Does this warrant spending scarce resources for no benefit?

Finally, the name of the community is University City, not "University".

Edward McGrath
3562 Mercer Lane,
SD 92122

From: Carole
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject: [EXTERNAL] Help Save UC"s Response to the Community Plan 2nd Draft
Date: Monday, April 29, 2024 5:16:05 PM

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As a resident of South UC since 1971, I am once again frustrated and dismayed to find our community's recommendations totally ignored. It is long past time to listen to and implement recommendations from the residents of South University City. I support Help Save UC and agree with their mess. Please implement Help Save UC's message below:

View in browser

Dear Friends of UC,

This is the second of two emails from us this week regarding the University Community Plan Update. The first email (sent yesterday) contained our comments on the Draft Program Environmental Impact Report (DPEIR).

This email summarizes our comments on the Second Draft of the University Community Plan.

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Download Our Community Plan Comments

We have submitted a letter to the City, dated April 27, 2024, detailing our comments on the Second Draft of the Plan. As

discussed in our prior communications, the City rejected most of the recommendations we submitted after the Community Discussion Draft of the Plan was released last spring. We have therefore reiterated our comments with the goal that the City would agree to some minor compromises to help protect the existing communities and the environment.

Comments **must be submitted by Monday, April 29, 2024** and are submitted to planuniversity@sandiego.gov. You may also want to copy Mayor Todd Gloria at mayortoddgloria@sandiego.gov, Councilmember Joe LaCava at JoeLaCava@sandiego.gov, and Councilmember Kent Lee at KentLee@sandiego.gov.

If you agree with our recommendations, we encourage you to submit your own comments.

The following sample email summarizes our main comments. Please feel free to use it:

From:	sellzbot@aol.com
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University City Community Plan Update
Date:	Monday, April 29, 2024 5:03:35 PM

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To whom it may concern,

Below are my comments to the City of San Diego's revised University Community Plan Update (University CPU):

On April 22, 2024, my daughters and I attended the meeting held at the UC Library to hear City Council member Kent Lee speak and to have the opportunity to ask questions.

From the beginning, it was stated that there was a time constraint and only a few questions from the attendees would be allowed at the end of the meeting. I think everyone was frustrated, hardly any time was spent by Kent Lee talking about the impact of the proposed changes for higher density and changing our shopping centers and how it will effect our community. I almost wanted to stand up and say "Hey! Why don't you talk about what we have all come to this meeting for!!!"

It felt like the meeting was directed with an outline of talking points with pre-prescribed, tailor-made questions, read out loud, to act as though the questions were received by concerned residents, making it appear as though all residents and their concerns had been heard and had been included, when in actuality Kent Lee avoided speaking about the most important topics! We were all wearing badges to "Save our shopping centers!"

In the meeting I learned and didn't realize that the Costa Verde shopping center has been sitting, not moving forward with construction at a halt, and may need a new environmental study with new plans and that is has become a homeless encampment? I have heard how the senior citizens in the retirement towers nearby are afraid to walk over to the UTC Westfield Shopping Mall in the evening to have dinner at the restaurants because they are fearful of being accosted by homeless persons.

I have a friend who lives at Nobel and she has told me how the residents do not feel safe to go out at night anymore to walk their dogs.

During Kent Lee's speech, he made a statement that the crime rate has dropped in San Diego, and then added, well in some areas, but he was not specific.

I believe the majority of San Diego citizens would have to disagree.

A major drug ring recently got busted dealing fentanyl in the Sports Arena area and down town San Diego?

Fentanyl over-dose, is the leading cause of death to persons the age 18 - 48, and 150,000 have died in our country in the past year, that's 100,000 more than the amount of people who died in the Vietnam war.

San Diego has now become the major point of entry in the United States for illegal immigrants entering our country. This includes persons with ill-intent on committing crime. We are witnessing boats landing on our beaches where young men get out and run off into the nearby neighborhoods.

Businesses, especially in California, are closing due to increased shop lifting and smash and grab robbery due to the absurdity of the lenient laws of any theft below $950 is reduced from a felony to a misdemeanor. I recently went to the Michaels Store located at the Clairemont Square, and I noticed as soon as I walked in that there were no

shopping carts. I asked the employees and I was told the shopping carts had been stolen, that shoppers were filling them up and leaving the store without paying. The increase in crime is nationwide. I believe open borders leads to lawlessness. If people are coming in without respecting the process to gain citizenship, why would they respect our laws? At the meeting Kent Lee said that the average response time by the San Diego Police is a two hour wait for home and auto burglary? Recruiting and the retention of police officers to our police force is problematic. I do not know why anyone would want to become a police officer when many officers have been targeted and those that have lost their lives. Why would Kent Lee have made the statement at this meeting that crime is down?

I wanted to ask Kent Lee and Mayor Todd Gloria, who all the people are who need affordable housing? Demographics show a considerable amount of people leaving California and there are low birth rates worldwide. Building more housing doesn't make it affordable. In fact, the argument can be made it's just the opposite. The money in construction comes from investors who want to make it a profitable investment. My friend who lives off of Nobel Drive in one of the most affordable rental units in the area, has to find housing elsewhere because her building is being demolished to build more units that will be rented at higher prices making it more profitable with only a small percentage being allocated as affordable housing.

I believe using the student body from UCSD as an argument for the need to build more affordable housing is deceptive as was the survey results presented by the city at a University City Planning meeting, presenting an overwhelming response for higher density, when it was found the survey disproportionately represented the students, who do not have a long term commitment, and it was not from the residents, who do have a long term investment in their homes and the community.
I remember participating in the zoom meeting and the city had hastily put out this survey two weeks before, asking everyone to submit it; and based on this survey, the city made this claim and as the meeting progressed, everyone caught on that the city had all of these students fill out the survey in which the results were based. Several residents spoke out, (including myself) at the meeting and it was evident what the city was trying to do.

Kent lee discussed how to "calm" traffic on Governor Drive, a contradiction when you consider how the city wants to eliminate a traffic lane in both directions (dedicating it to bike lanes) and placing up to 100' high rise buildings with more residents off of Governor Drive.

I was disheartened to hear at the meeting that there are proposals to build a new library in University City. Our library is perfect and it fits the area. The comment was made how it no longer adequately serves the community. I think this is nonsense, like what happened with the the downtown library and how an extraordinary amount of money was spent to build a new one and it became a drug and homeless center.

I thought a comment a gentleman made at the meeting was good, it needs to be put to a vote by the residents, and not implemented by the city and Mayor Todd Gloria, to fulfill an impossible mandate from the office of Gov. Gavin Newsom, mandated to all of the cities throughout the state to build affordable housing, when the number of units in which has been imposed has never been achieved before in a given year.

I feel all of these proposals are being orchestrated by people who do not live in the area and are not connected to or care about what will happen to the quality of life in University City.

Thank you,

Karen J. Sells
resident of university City since 1962

From:	Richard Carson
To:	PLN University Community Plan Update
Subject:	[EXTERNAL] Comment on Population Forecast Used Throughout University City Community Plan Document
Date:	Monday, April 29, 2024 4:58:23 PM
Attachments:	ImplicationOfCurrentSanDiegoPopForecast24.pdf

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear University City Community Planning Group,

The current University City Community Plan (March 2024, p. 44) is based on population and housing need estimates (SANDAG Series 14) that are now known to be gross overestimates based on recently released March 2024 California Department of Finance for counties (https://urldefense.com/v3/__https://dof.ca.gov/forecasting/demographics/projections/__;!!OBed2aHXvKmHymw!zoSiwyScA-R39FktTFSaF2UTQZH6cWUgiZuGjI5p_rWtcP9KviAwYElBeGODTLLSBZthmXTStWD5WKNlDS-ZGSgy9eczgQ$) as well as the new SANDAG Series 15 estimates (https://urldefense.com/v3/__https://adlsdasadsprodpublicwest.z22.web.core.windows.net/sr15/sr15-infobits-march2024.pdf__;!!OBed2aHXvKmHymw!zoSiwyScA-R39FktTFSaF2UTQZH6cWUgiZuGjI5p_rWtcP9KviAwYElBeGODTLLSBZthmXTStWD5WKNlDS-ZGSg9SUvNmQ$). These downward revisions suggests the county as a whole will only grow by about 5,000 people a year between now and 2050 (with the region's population declining thereafter). These new forecasts have large scale implications for almost all aspects of the proposed community plan. I suggest the plan update be put on hold until it can be reworked with the new projections.

A short piece I wrote on this issue appears in the Times of San Diego

https://urldefense.com/v3/__https://timesofsandiego.com/opinion/2024/04/29/as-population-growth-slows-san-diego-may-not-need-to-build-as-many-new-homes/__;!!OBed2aHXvKmHymw!zoSiwyScA-R39FktTFSaF2UTQZH6cWUgiZuGjI5p_rWtcP9KviAwYElBeGODTLLSBZthmXTStWD5WKNlDS-ZGSgTfMIMng$

A longer version of the analysis is attached with more details on how the SANDAG Series 12-15 projections have changed over time and a discussion of persons-per-housing units issue. The demographic transition which has been impacting California and San Diego has been apparent for some time and the massive population growth once envisioned by SANDAG and the City of San Diego is no longer a plausible outcome. San Diego County's population has fallen almost every year since 2018, while building through the county has proceeded at a fairly brisk clip. Both contributed to wiping out the housing deficit associated with the Great Recession, which the University City Plan update sought to address.

Richard

Professor Richard T. Carson
Department of Economics, 0508
University of California, San Diego
La Jolla, CA 92093
https://urldefense.com/v3/__http://www.econ.ucsd.edu/*rcarson__;fg!!OBed2aHXvKmHymw!zoSiwyScA-R39FktTFSaF2UTQZH6cWUgiZuGjI5p_rWtcP9KviAwYElBeGODTLLSBZthmXTStWD5WKNlDS-ZGSiQG7TLPg$

From:	Karen Arden
To:	PLN University Community Plan Update; Lukes, Suchitra
Cc:	CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Causman, Nathen; CouncilMember Joe LaCava; Karen Arden
Subject:	[EXTERNAL] Comments on the revised University Community Plan Update
Date:	Monday, April 29, 2024 3:21:35 PM
Attachments:	April 2024 Help Save UC Plan Update Comments.pdf

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Dear Mr. Lukes,

I am writing regarding the March 2004 Second Draft of the University Community Plan.

I have a number of concerns with the city's plan and have itemized them below. I also want to go on the record with my support Help Save UC and all their comments. I am not a signatory on their letter, but I have seen it and support their response (please see attached).

Safety: The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. Yet, there is no discussion, in either the revised University CPU or the DEIR, about how the enormous population increase proposed by the City will impact the safety of the community or how it will be addressed.

Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. When the 2006 Witch Creek fire was approaching the University Community, there was only one way out of the South area and that was north on Genesee Ave. Fortunately, the wind died down and we didn't need to evacuate although those of us in the east end of the South University were packed up and ready to go at the suggestion of the police monitoring the situation. I don't think there was any way that everyone in the south University Community could have gotten out safely if the fire continued across the Mira Mar military base. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. The original community plan had two additional entrances/exits to the community, but these have been removed as options over the years. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

I am also concerned how the reduction of Governor Drive to one lane each way between Genesee Ave. and Regents Road will affect the historically long emergency response times in our south University Community. I did not see an analyses emergency response times with the addition of a significant number of. people in the

development at the Vons and Sprouts shopping areas. We need an updated traffic analysis that includes modeling for the proposed future development.

Schools: San Diego Uni8fied School District is clear that ano0ther elementary school will be needed (Appendix I-2 University Community Plan Update - Potential Student Generation letter - September 2023. SDUSD states in their letter dated September 14, 2023, “Implementation of the University Community Plan Update will likely require significant expansion of existing school facilities, or construction of new facilities, at the elementary level. The district does not currently have any long-range facility plans that could possibly accommodate the estimated number of generated students. Land for new schools should be set aside in the University Community Plan Update. In particular, land for new schools is likely to be needed in the north section of the University area, in the vicinity of La Jolla Village Drive and Genesee Avenue intersection.” This is not addressed by the University Plan Update and must be addressed for proper planning.

Parks and Recreation Spaces: The University Community is currently well below the Recreation Value Points that is should have based on population and will remain low under the proposed plan. The University Community currently has only 60% of. The new plan contains only a minor increase parks and recreation spaces and will not adequately serve the number of people it proposes to add to the area. With the new plan, the community will still only have 60% of the Recreation Value Points it should have There is nothing in the proposal to change this. The Recreation Value Points system is the new system implemented by the city to ensure all communities have adequate recreation opportunities. This plan, by the city’s own measure, falls significantly short. The Plan provides very little additional park space and maintains the existing deficit with no plan for improvement. This must be addressed.

In the absence of the city’s ability to provide adequate infrastructure for the proposed plan, I support the following recommendations made by Help Save UC:

The City should not up-zone our two south UC shopping centers to CC-3-8 zoning, which would further add to traffic congestion on Governor Drive, jeopardize community safety by adding such a large population and make the centers far out of scale with the surrounding residential community.

The Sprouts shopping center IS NOT an existing Transit Priority Area. Buses do not stop there frequently and it's a far distance away from the trolley and an existing TPA. The zoning at the Sprouts center should be 0-29 dwelling units per acre, the height limit should be no more than 40 feet, and the setbacks should be at least 30 feet.

The Vons shopping center zoning should be reduced to 0-54 units per acre, the limit should be no more than 50 feet, and the setbacks should be at least 30 feet from residential properties.

Sincerely,

Karen C. Arden
University Community Resident for 30 years

From: Kirby Baker
To: PLN University Community Plan Update
Cc: William Beck
Subject: [EXTERNAL] Community Plan, 2nd update, mobility section
Date: Monday, April 29, 2024 3:07:50 PM

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1. **Context:** These comments apply to the portion of Towne Centre Dr. from La Jolla Village Dr. south to Nobel Dr., and in particular to the intersection at **Towne Centre Dr. and Excalibur Way**, where there are no traffic lights, only a stop sign on Excalibur, just before the crosswalk.

2. **A hazard:** A nightmarish hazard for cyclists is to be riding on a downslope, with a rightward bend that restricts forward visibility, and then to encounter a vehicle blocking the bicycle lane, perhaps suddenly. With the Draft Mobility Plan to add **Class II bicycle lanes to Towne Centre Dr** , this scenario can easily happen southbound at Excalibur Way. I urge mobility planners to give special attention to this intersection, even considering modifying the plan.

3. **Current situation:** Excalibur Way is the only exit for the Vista La Jolla community of 56 homes. The intersection with Towne Centre Dr. is already problematic for drivers exiting Excalibur, because Towne Centre Dr. has a curve with berm that partially obscures southbound vehicle traffic from them. Moreover, southbound traffic is going downhill, often fast. A driver exiting Excalibur may have only a 5-second interval between the appearance of a southbound vehicle and its arrival at the intersection. As a result, drivers pulling out of Vista La Jolla proceed to the edge of the traffic lane, look, and hold up if a southbound vehicle is sighted. Often there is a group of vehicles coming down after the signal a block uphill turns green, necessitating an extended hold.

At present there is at least a striped no-parking zone on southbound Towne Centre Dr. from the intersection northwards, for perhaps 50 ft., to increase visibility. This zone is also helpful to drivers turning from southbound Towne Centre Dr. into Excalibur Way, as they can pull into it from the main traffic lane before turning, out of the way of downhill drivers pursuing them, who don't expect them to decelerate.

4. **Effect of plans:** I gather that a Class II bicycle lane might either be (a) in place of existing parking or (b) adjacent to existing parking. I'll cover both options:

(a) If it is the intention to remove existing vehicle parking along Towne Centre Dr. along with the striped zone mentioned, then that is a double disaster: In addition to the possibility of finding a car stopped crossways in the bicycle lane, cyclists may find that a car passing them going downhill and intending to turn right into Excalibur is forced by pursuing traffic to pull into the bicycle lane while decelerating. Moreover, cyclists will have a shorter time to react to a car pulling out of Excalibur Way.

(b) If it is the intention to retain existing parking on southbound Towne Centre Dr, with a bicycle lane adjacent, then cars exiting Excalibur will still be stopping to block the bicycle

lane, when they suddenly see one or more vehicles coming down at them, forcing a wait.

In both scenarios, there is also the likelihood that some cyclists at night will not be sufficiently visible to drivers exiting Excalibur.

5. **Additional comment:** It does not seem that mere signage will be sufficient to avoid collisions, as the conflicts described are built into the geography.

6. **Request:** In evaluating the Draft Mobility Plan, please assess the view of this intersection as seen by cyclists and drivers on Towne Centre Dr. approaching it from the north.

Submitted by

Kirby A. Baker, Ph.D.
8992 Montrose Way
San Diego, CA 92122

310-804-7103
bakerkirbya@gmail.com

From:	Ekaterina Tabenkina
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] URGENT: Comments to Revised University Community Plan Update
Date:	Monday, April 29, 2024 3:06:30 PM

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To Whom It May Concern

I have lived in UTC for 26 years and I fully support the following comments that must be seriously considered at the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee ave. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full build out, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Regards,

Ekaterina Tabenkina (5210 Renaissance ave., 92122)

From: Victoria Aza-Rossi
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Monday, April 29, 2024 2:43:45 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties

and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to

Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Victoria Aza-Rossi/92122

From:	Anita Wilson
To:	PLN University Community Plan Update; Gloria, Todd; CouncilMember Kent Lee; CouncilMember Joe LaCava
Cc:	Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; universitycitypeeps@gmail.com; Anita Wilson
Subject:	[EXTERNAL] Comments to Revised University City Plan Update
Date:	Monday, April 29, 2024 2:18:53 PM
Attachments:	EXTERNAL Comments to Revised University City Plan Update.msg

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To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast.

I volunteer by Balboa Park and routinely encounter issues as a result of the buss and bike lanes previously installed there. During days with events (pretty routine) it can take almost an hour to get into the park and 30+ minutes to exit. Just last week there was a Bus in the bus lane and a school bus behind me while the rest of the bus lane was wide open so having a bus lane restricts cars to one lane but allows busses to use 2 lanes! When I need to turn right to get into the park I have to cross the two lanes and am always nervous I may not see a bike come, however I've yet to see anyone use the bike lane. I've also witnessed and been on the receiving end of people displaying extreme road rage because they are so frustrated with the restricted lanes and backed up cars. I've never been so scared while driving. Please don't do the same to Governor Drive. The analysis by the city for the new plan is based on data from 2015 and does not reflect current traffic patterns. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. Every morning and afternoon the street is lined by cars with parents dropping off or picking up their children. During the evenings and on weekends the same occurs with events at the ball field and the new pool. Restricting Governor Dr. To one car lane will be very detrimental to thousands of residents and guests to UC. Additionally, I rarely see a bus and never see bikers. On the rare occasion I see a bus I don't see anyone on it as a rider. I'm a cyclist but would never request the city take away a car lane so I can bike and negatively impact thousands of others. When I want to bike I put it in may car and go to other places that are more scenic for biking.

II. Governor Drive retail spaces Changes. The plan to tear down and build high rises on Governor Drive would have a significant and very negative impact to our community. I live down the street from the Sprouts grocery store and picked my house in part due to the proximity of shopping and other businesses in the strip mall. We have a great veterinary office, popular Thai restaurant and other wonderful businesses. Additionally we have a wonderful post office that is always busy. Plans to rezone this area will incentivize the landlord to remove those businesses and leave us without any replacement and with a 10-story monstrosity that will tower over our neighborhood. The plans also don't include sufficient parking and we don't have necessary public transportation to support this plan. There is one bus route that rarely runs and we are miles from the trolley so people will take over all the street parking for current residents, like the ADU's people are building in the community. During one recent UCPG meeting a planning group member told us we could just go to Clairmont to grocery shop! One of the developers on the committee works for the company who is supposed to renovate Costa Verde, yet two years latter it's still sitting there basically untouched. We lost a great grocery store there and have heard there won't be any replacement. How can you allow this to happen?

III. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

IV. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

V. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

VI. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

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Please listen to the requests of the residents and don't try and make University City another downtown. If I, or my neighbors, wanted to live by high-rises and not have easy access to grocery stores, veterinary offices and the post office, we would have bought a place downtown but we moved here because of the community and current design. Thousands of residences have already been built in University City but we continue to take the biggest impact from the San Diego planning committee housing despite our small size in relation to all of San Diego. There are dozens of vacant office and government buildings that should be converted to housing units which won't impact beautiful neighborhoods. Please focus on those options.

Sincerely,
Anita Wilson
3143 Carnegie Court
San Diego, CA92122

From:	Ellen Person
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; University Peeps
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Monday, April 29, 2024 2:15:43 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage.

The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

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VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Ellen Person
5614 Bloch St.

San Diego 92122

From: Harry Griswold
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Monday, April 29, 2024 1:01:50 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Those in Decision-Making Positions:

These are my comments in response to the City of San Diego's alarming revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre.

This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to

walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in

order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than someone's nightmarish dream.

Most Sincerely,

Harry Griswold, resident

5556 Stresemann St
Same Diego, CA 92122

From: CLIVE ESSAKOW
To: ncausman@sandiego.cov; Lukes, Suchitra; tomlins@sandiego.gov
Cc: Paula Robins
Subject: [EXTERNAL] University City- San Diego's Density Increase Plan
Date: Monday, April 29, 2024 12:54:08 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To the City Planning Department:

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets". It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without
a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly

during rush hours and when the
schools let out and parents are attempting to pick up or drop off their children.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Planning Deficiencies in Parks

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The
City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Sincerely,

Clive Essakow and Paula Robins – Owners and residents of the Cambridge Terrace HOA

From: Tom Cartier
To: PLN University Community Plan Update
Subject: [EXTERNAL] UC Community Plan Comments
Date: Monday, April 29, 2024 12:50:35 PM
Attachments: DEIR_Comments.docx

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear University CPU,
There are structural flaws in the University draft environmental impact report (EIR). Attached are specific items that must be addressed and changed. **Most importantly, reducing vehicular access on Governor Drive by removing 2 lanes exponentially increases the risk of successful emergency wildfire evacuation.** Please consider alternate options before the process moves forward as currently identified in the draft EIR.

Sincerely,
Tom Cartier
UC Fire Safe Council, Treasurer
Standley Community Recreation Group, UCLL Representative
University City Parks Council, Vice President

From:	Katie Dunahoo
To:	PLN University Community Plan Update; Lukes, Suchitra; CouncilMember Kent Lee; CouncilMember Joe LaCava; Burton, Zach
Subject:	[EXTERNAL] Governor Drive-concern with plan
Date:	Monday, April 29, 2024 12:42:22 PM

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The city has been discussing making Governor Drive one lane and I am very against it. I suspect that the study was done during covid school shutdowns or maybe at hours when the schools were not in pick up or drop off. With 4 lanes it is already a big problem. The pool at Standley Park is new and will attract more water polo and swimming events and this will also cause a great deal of congestion and parking problems. We want to avoid drivers cutting though nearby neighborhoods.

Please vote against this proposal and if you must consider it, please do an adequate traffic study. Yo will see what I mean.

Thank you for listening, Katie Dunahoo

Katie Dunahoo
Broker Associate

Katie Dunahoo
858.775.1239
ktdunahoo@gmail.com
License #00694822
University City & La Jolla Offices

Photo

Logo

DunahooRealtyGroup.com

Winner #1 Large Team for Coldwell Banker Realty in San Diego County
San Diego Magazine's Five Star Real Estate Agent Award 2015 - 2024
Coldwell Banker Global Luxury - Luxury Property Specialist

From:	Vladimir Radomirovic
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject:	[EXTERNAL] Response to the Community Plan 2nd Draft
Date:	Monday, April 29, 2024 12:29:10 PM

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To Whom It May Concern:

I'm combining my comments with Help Save UC comments.

I really appreciate City of San Diego taking into account input of large majority residents of the South UC.

Regards

Vladimir Radomirovic

6509 Cascade st, 92122

- Population of California and the City of San Diego is shrinking year over year. No need for over developing at this point https://ktla.com/news/california/new-census-estimates-show-which-california-counties-are-losing-residents/ (just an example, plus many other sources)
- Businesses in and around UC are having layoffs (big ones like Illumina, Qualcomm) and reducing staff, cancelling leases in the area. https://www.sandiegouniontribune.com/business/story/2024-01-02/illumina-offloads-san-diego-office-complex-for-54-million

- Plan does not take care of **Affordable Housing**. Having Affordable Housing percentage below 10% is ridiculous and shows real background of the City initiative - **helping Investors, not students or low income**

residents.

- Reducing Governor Dr to two lanes is an actual crime. We will have to bring in Fire Department into picture, you are planning to block single evacuation rout of the neighborhood. We have a canyon nearby and fire hazard is real (and imminent).
- Governor Dr is already congested during school drop-off and pick-up times. I cannot make left turn from Radcliffe dr to Governor dr sometimes for 15 minutes due to Standley Middle of UCHS crowds. It cannot be two lane street.
- No requests from residents were accepted in new up zoning proposal (Vons and Sprouts malls). This is extremely disappointing.
- New LUX high rises in UTC are already showing increased criminal, drug cartel related activities. https://fox5sandiego.com/news/local-news/police-investigate-death-outside-university-city-high-rise/

This proves that new residents of UTC are NOT UCSD students and low income families but instead drug lords and criminals with cash.

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54

dwelling units/acre.

4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

From: Hola hola
To: PLN_PlanningCEQA
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to University Community Plan Update Draft EIR
Date: Monday, April 29, 2024 12:22:36 PM

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To Whom It May Concern:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of

alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,

Mirian Schnaidman, University City resident (92122)

From:	Alain Noncovich
To:	CouncilMember Kent Lee; Causman, Nathen; Gloria, Todd; PLN_PlanningCEQA; Lukes, Suchitra; tomlins@sandiego.gov
Subject:	[EXTERNAL] Concerns Regarding City"s Environmental Impact Report and Housing Development Plans
Date:	Monday, April 29, 2024 12:19:00 PM

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Dear Representatives,

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the

schools let out and parents are attempting to pick up or drop off their children.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Planning Deficiencies in Parks

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

--
Alain Noncovich - member of HOA Cambridge Terrace Owners Association

From:	Katie Nelson Rodolico
To:	PLN University Community Plan Update; CouncilMember Kent Lee; CouncilMember Joe LaCava; Burton, Zach; Gloria, Todd
Subject:	[EXTERNAL] Comments on the University CPU supplemental documents
Date:	Monday, April 29, 2024 12:11:53 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hello,

My name is Katie Rodolico. I was a University CPU subcommittee member representing the University City Community Association. The following are my opinions and do not represent the UCPG the University CPUS, nor UCCA.

Document: Draft Engagement Summary:

Page 2: Correct the following: The open house was held in the fall of 2018, subcommitee members were selected in late fall 2018.

Page 2: There was an in person meeting at UCHS in summer 2022.

Page 2: The link to the 2019 survey is broken.

Page 5: Document states a max of 218 du/acre, but under the alternative HD plan in the draft PEIR max is 290 du/acre.

Page 7: The PEIR reintroduces the 290 du/acre in the HD alternative. (Despite not actually evaluating the impacts.) It was declared the environmental solution - do not suggest the plan only allows 218 du/acre than bait and switch in the PEIR.

Page 7: Affordable housing: I would suggest that if affordable housing will be built - only offer ONE alternative means of compliance, offsite OR in-lieu... preferably offsite since that would actually result in additional affordable housing units. No more free rides for developers.

Page 8: Naturally occurring affordable housing is currently proposed to be wiped out in a "Complete Communities" proposed development at Nobel and Genesee. This particular complex was mentioned repeatedly during the 5 years of subcommittee meetings as being at risk of losing naturally occuring affordable housing. The plan will not protect these affordable units if that development proposal is approved by the city.

Page 13: Public spaces need to be added. End of story. Eliminate the in-lieu fees for public amenities. Alternatively, have an annual, repeating, in-lieu fee that might allow future owners to decide to offer public amenities at a later date if the ownership changes.

Page 13: Including native plants and trees is good. But get rid of the non-native trees/plants, especially highly flammable Eucalyptus trees. Much of the area is in a high wildfire risk area - so flammable trees are not a good match.

Page 16: Schools on Governor dr are mentioned. Prior to reducing lanes on Governor Dr do an actual traffic study that looks specifically at school drop off and pick up times. Reducing lanes will result in double parking, parking in bike lanes, etc. Don't underestimate a mom late for school drop off.

Page 16: You fail to address the kids who live north of Rose Canyon who are in the Curie and Spreckels school boundaries. They can't walk to school, no SDUSD bus is provided. Parents must drive their kids.

Page 17: Governor and Genesee is not a TPA. Until there is frequent bus service, stop treating it like a TPA.

Page 24: You can't state that developers will provide the needed public amenities if you allow in-lieu fees to avoid providing amenities.

Page 27: Access to Lawrence JCC is expensive and for some things requires membership. This is not a public park. Redo the lease when it comes up to require it be affordable comparable to other public parks and aquatic centers.

Page 32: Increased density requires beefing up egress routes. Reducing lanes on Governor Dr works in opposition to this. Reduction in lanes will also negatively effect first responder times.

Page 34: SDUSD provided feedback that a new elementary school would be needed in North University near La Jolla Village and Genesee. The plan does not address trying to find a site for this school. It does not address the fact that currently kids in that area are in school boundaries for Spreckels and Curie and must be driven to school.

Page 36: The plan does not REQUIRE public amenities be provided. In fact it offers an easy way to get out of providing amenities in the form of in-lieu fees for amenities. One time fees should be replaced with annual fees. Then if a developer wants to avoid the ongoing cost of paying these fees, they would be incentivized to start providing them. Some facilities that might house bio tech with security concerns, initially, might change tenants and no longer be looking to avoid providing the amenities.

<u>Draft Mobility Technical Report</u>:

Page 15: Repeats Governor and Edmonton
Page 15: Repeats Governor and Agee.

Thank you,

Katie Rodolico
5906 Dirac Street
San Diego, CA 92122

From: David Ramirez
To: Gloria, Todd; CouncilMember Kent Lee; CouncilMember Joe LaCava; Lukes, Suchitra
Subject: [EXTERNAL] Court Ruling on SB 9 (LA Times, 4/19/24)
Date: Monday, April 29, 2024 12:10:28 PM

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Mayor and City Council Members:

In today's issue of the Los Angeles Times, in the California section, there is an article which indicates the Los Angeles County Superior court has recently found that Senate Bill 9 does not provide housing restrictions for low-income residents and therefore cannot override state constitution protections afforded to local zoning practices. The provisions of SB 9 are not reasonably related and sufficiently narrowly tailored to the explicit state purpose of that legislation- namely, to ensure access to affordable housing. **SB 9, in essence, as it is currently written, is unconstitutional.** If this ruling is upheld, then it will affect San Diego and other cities as well.

My concern is that many of the City's Community Plans had SB 9 in mind when those plans were originally initiated. I suggest we back off any further community plans until this issue is finally resolved by the Courts and the State Legislation. **The City needs to properly assess the situation before proceeding any further.**

I note that like the LASC's ruling on SB 9, the UC Revised Community Plan has no regard for how it would affect the City's ability to provide water, policing, fire and other municipal services, and without any guarantee the new development would help those most in need.

I would also suggest that if the City is truly concerned about "affordable housing," then it would carefully review this LASC's decision as it sets for what criteria is actually necessary. I note that nowhere in any of the University City revised plans and documents does it even mention or require developers to set aside units for low-income residents. The developers can build all they want but they don't have to set aside any affordable units. Without this requirement, developers will come into the community and build full market rate units which will only exacerbate the affordable housing crisis. We see developers have already been doing under the current ADU rules. A review of the rental advertisements for ADU units here in UC area indicates monthly rentals in the $4,000 to $5,000 range. That is not affordable housing.

Also, I would appreciate this City to take a mindful look at SB 9 and other state issues carefully and thoughtfully instead of marching blindly lockstep with Sacramento politics. I did not see any vetting of SB9 other than a mere adoption of it. This City has much to offer all of us but if we don't carefully evaluate what the State Legislature shoves down our throats, then it will be much less of a desirable place for all of us.

I thank you for your anticipated courtesy and time in this matter.

Sincerely,

David Ramirez
3345 Huggins Street
San Diego, CA 92122
(858) 457-1023

From: Devora Rossi
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Monday, April 29, 2024 11:49:13 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using

Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than

doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Devora Rossi, University City resident (92122)

From: David Ramirez
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; CouncilMember Joe LaCava
Subject: [EXTERNAL] University Community Plan Update
Date: Monday, April 29, 2024 11:26:42 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC and I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Sincerely,

David Ramirez
4533 Huggins Street
San Diego, Ca 92122
(858) 457-1023

From: Deb
To: PLN_PlanningCEQA
Cc: Gloria, Todd; CouncilMember Kent Lee; CouncilMember Joe LaCava; Lukes, Suchitra
Subject: [EXTERNAL] Comments To Revised University Community Plan Update
Date: Monday, April 29, 2024 10:48:19 AM

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To Whom It May Concern:

I am a current resident of University City and have lived here for 24 years. I have become a part of this community and have supported all groups and schools that make this community a wonderful place to live in. I am concerned that the changes being proposed within the University Community Plan Update will not improve the community but they will make it a much less desirable and unsafe area to live in.

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. **The City Should Reduce the Proposed Housing Density By at Least Half**. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more

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Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

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San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

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envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Deborah Ramirez
4533 Huggins Street
San Diego, Ca 92122

From:	Harry Mathis
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; CouncilMember Joe LaCava
Subject:	[EXTERNAL] Comments on the second draft of the UCPU
Date:	Monday, April 29, 2024 10:47:57 AM
Attachments:	Comment on the UCP Update.pages

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Attached are my comments on the second draft of the UCPU.

From:	Julie Meier Wright
To:	PLN_PlanningCEQA
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; University City Peeps
Subject:	[EXTERNAL] University City Community Plan Update Draft EIR
Date:	Monday, April 29, 2024 10:16:28 AM
Attachments:	PastedGraphic-6.tiff

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In addition to fully endorsing the letter below, which I reviewed prior to its being sent to University City residents who are most affected by this DEIR, let me add some additional comments as a 27-year resident of University City.

I fully support the need for density in San Diego, but the answer needs to be regional and impact fairly the region's 3.3-million citizens. It needs to be data-driven, not pie-in-the-sky wishful thinking. It should reflect a city and region that embraces planned density projects, not shoehorning buildings of inappropriate size into neighborhoods with no regard to the character of single-family neighborhoods, the loss of sunshine and privacy, the inattention to parking, and the inexcusable impact on public safety.
Former mayor Jerry Sanders once told me that his biggest nightmare was an urban canyon wildfire. As a member of an advisory board for the WIFIRE program at UC San Diego, I have seen first-hand how dangerous canyon fires can be even though this plan includes homes in severe fire danger zones. Do you need a wildfire with loss of life to convince you that the plan you are trying to pass is grossly insufficient?

You don't use transit in an emergency. And wishful thinking doesn't move people into transit. What does is a clean and safe transit system that is very convenient to residents, not a mile away — a transit system that gets people from home to jobs in not much more time than driving. We do not have that today, even in University City where some of the density planned isn't remotely close to transit. What "transit first" should mean is a working transit system before increased density with loss of parking and roadways.

I love the current density in University City but I do not believe that this part of San Diego should play a disproportionate role in meeting the entire region's housing needs when the trolley, as just one example, has 62 stops where transit-oriented density can be planned and built. That — along with an effective shuttle system — has the potential to get people out of vehicles. It's clear that $6/gal gas and sky-high parking costs — not providing grossly insufficient parking — have not done it. People drive because it is what works best for them and their families.

I am completely frustrated by the lack of data-driven decision-making in the City of San Diego; wishful thinking about some desired utopia just makes voters angry. I am tired of driving on streets re-engineered to accommodate an entire traffic lane of bicycles only to see no bicycles while traffic is backed up. Do not do this to Governor Drive, with its already inadequate school and park capacity and heavy traffic burden today. An up-to-date traffic study of Governor Drive, Genesee Avenue and the rest of UC must be completed and, if the city really wants to be bold, reconsider the Regents Road Bridge — in the general plan since 1959 and blocked by a handful of residents who arrived after it was in the plan.

I have worked on efforts to reform the California Environmental Quality Act, but this effort falls far short of what the legitimate purpose of CEQA intended. The draft EIR needs to be rejected until current studies are completed.

> I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No

changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,

Julie Meier Wright
Public Affairs . Advocacy . Strategic Planning
Strategic Advisor, Collaborative Economics
Senior Fellow, US Council on Competitiveness
Senior Fellow, California Council on Science & Technology
NOTE: THIS ADDRESS IS INVALID AFTER 12/31/23. PLEASE CONTACT ME FOR AN UPDATED ADDRESS.
8895 Towne Centre Drive, Suite 105 - #110, San Diego CA 92122
C: 619 300 5800

From: Tomlins, Coby
To: PLN University Community Plan Update
Cc: Lukes, Suchitra
Subject: FW: [EXTERNAL] Response to City"s latest EIR
Date: Monday, April 29, 2024 9:17:33 AM

From: Dongdong <ddd2388@gmail.com>
Sent: Sunday, April 28, 2024 10:03 PM
To: Tomlins, Coby <CTomlins@sandiego.gov>
Subject: [EXTERNAL] Response to City's latest EIR

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Mr. Tomlins,
As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas. That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Planning Deficiencies in Parks

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The
City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Sincerely,
Dongdong Dong
Owner, 8168 Avenida Navidad, #21
La Jolla City Club HOA

From:	Tomlins, Coby
To:	PLN University Community Plan Update
Cc:	Lukes, Suchitra
Subject:	FW: [EXTERNAL] University City Environmental Report for Housing
Date:	Monday, April 29, 2024 9:15:03 AM
Attachments:	UTC Resident letter to UTC Board 4_2024.pdf

From: Carmella George <carmella.george@yahoo.com>
Sent: Sunday, April 28, 2024 12:28 PM
To: tomlins@sandiego.gov; Tomlins, Coby <CTomlins@sandiego.gov>
Subject: [EXTERNAL] University City Environmental Report for Housing

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Mr. Tomlins,

Please see attached my response and concern for the Housing Plan for University City.

Thanks for your consideration.

Carmella George Cotta
Homeowner at La Jolla City Club since 1989

From:	Kaylee Brogadir
To:	Gloria, Todd; CouncilMember Kent Lee; Tomlins, Coby; Lukes, Suchitra; Galloway, Tait; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Monday, April 29, 2024 9:00:23 AM

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II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current

and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University

CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create “more places to walk, bike, play and interact with each other," but it doesn’t provide sound solutions to accommodate sports nor come close to improving UC’s current park deficit and relatively low ranking on the ParkScore Index.

VII. The City’s Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City’s argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC’s demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego’s public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire

and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Kaylee Brogadir
5941 Stresemann Street
San Diego CA 92122

From: Jeanne Hoey
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject: [EXTERNAL] UC Community Plan Update Second Draft
Date: Monday, April 29, 2024 8:54:04 AM

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o Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community

serving retail, food, beverage, and grocery use.

Regards,

Kenway & Jeanne Hoey

From: michalek1@aol.com
To: PLN_PlanningCEQA
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava
Subject: [EXTERNAL] Quit trying to destroy UC with overreaching Community Plan DEIR
Date: Monday, April 29, 2024 8:47:07 AM

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To Whom It May Concern:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating

specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts : The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Mark and Meleen Michalek
2958 Renault Street, San Diego, CA 92122

From:	Jennifer Dunaway
To:	PLN_PlanningCEQA; PLN University Community Plan Update
Cc:	Chris Nielsen; Andrew Wiese; Help Save UC; CouncilMember Kent Lee; Bonnie Kutch
Subject:	[EXTERNAL] comments on Draft UC Plan and DEIR
Date:	Monday, April 29, 2024 8:36:53 AM

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Greetings;
Regarding fire and emergency egress in case of emergency, the City EIR states that existing roadways can handle adequate egress in case of emergency or fire emergency with the proposed new population increase. This is wrong, since in the same document the City is proposing to reduce most street lanes from 4 to 2, hindering escape. There needs to be an analysis with the downgraded streets and increased population on emergency egress.

Lastly, disturbingly, City Planning staff did not include the Community Preferred Scenario in the Draft EIR for study. Most EIRs have a few 'alternatives' to study and provide the 'decision maker' with choices on the way to move forward. This EIR essentially only has the "City Preferred Scenario' to study. As late as July 2023, the UCPG's subcommittee was studying both of these Scenarios and moving them both forward. Sadly, most of the comments from the community were integrated into the Community Preferred Scenario. Now the City Planning staff essentially throws that one away and uses the City Preferred Scenario as the way forward. Essentially all of the Community Comments are thrown in the trash and were for naught. We have asked why, and the best answer we got from Ms. Suchi Lukes, City Planner at the 9 April meeting was "that is a great question, we'll have to regroup on that to answer". WHY? It should be in the DEIR as an alternative.
/R Jen Dunaway

From:	Diane Ahern
To:	PLN University Community Plan Update; Lukes, Suchitra; CouncilMember Kent Lee; CouncilMember Joe LaCava; Burton, Zach
Cc:	Diane Ahern
Subject:	[EXTERNAL] Re University CPU - Governor Dr proposal likely to increase traffic on Milliken & Mercer & Stetson
Date:	Monday, April 29, 2024 6:01:25 AM

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Good morning,

We are against the proposal to reduce motorized vehicle traffic to one lane in each direction on Governor Drive because we think it is likely to increase traffic on neighboring through streets between Radcliffe, Mercer, Stadium and Regents such as Milliken and Stetson and Mercer. Refer to the attached Google map of Milliken and the surrounding area north of Governor Drive.

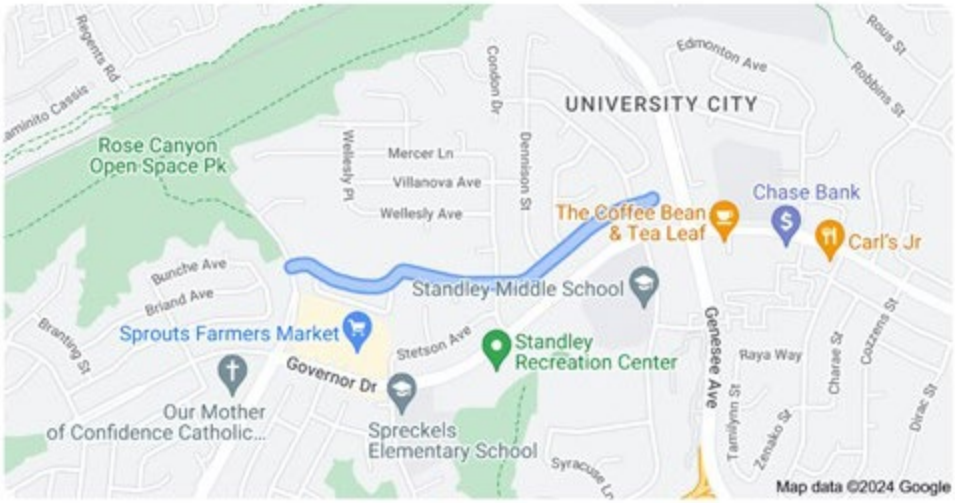
Drivers, including us, already use Milliken and Stetson and Mercer as alternatives to driving on Governor to attend events at Standley Park, the pools, the two public schools, and the joint use fields. If lanes for motorized vehicle traffic are reduced to one lane in each direction, we think that it will provide more incentive to push car and truck traffic off of Governor and onto neighboring streets especially Milliken, Mercer, and Stetson.

If the city reduces the number of lanes, the impact on neighboring streets will likely be accelerated when software such as Google maps and Waze routes traffic around the Governor congestion.

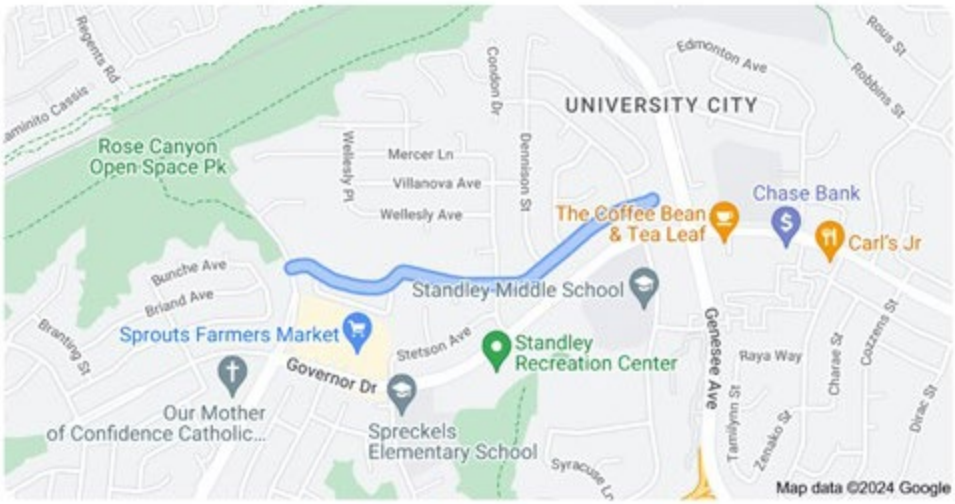
No change on Governor is warranted without a thorough traffic analysis with traffic study and VMT that not only evaluates current conditions as well as the likely future impacts of increased housing density and school enrollment, but also analyses the alternative routes likely taken by those who are trying to avoid the congestion caused by the reduction of vehicle traffic lanes on Governor Dr.

Thank you for reading.

- Take care,
Diane & Tom Ahern
University City (92122) residents



Millikin Ave
San Diego, CA 92122



Millikin Ave
San Diego, CA 92122

From:	Tom Cartier
To:	lanningceqa@sandiego.gov
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava
Subject:	[EXTERNAL] Comments regarding flawed UC DEIR
Date:	Sunday, April 28, 2024 11:48:09 PM
Attachments:	DEIR_Comments.docx

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Dear City Leaders and Planners.

There are structural flaws in the University draft environmental impact report. Below are specific items that must be addressed and changed. Please consider alternate options before the process moves forward as identified in the items listed below and summarized in the attached word document.

I. **The City Must Reduce the Proposed Housing Density By at Least 50%** The current proposed plan will add an additional 30,480 housing units to University City's (UC) existing 26,520 units while increasing the number of residents from 64,206 to a total of 129,566, and doubling the population. This proposal is an example of very poor planning. SANDAG's current Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to the UC community alone, is ridiculous. The existing UC infrastructure will not support population increase. There is no additional land to provide more housing. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. **Governor Drive must Not Be Reduced to Two Lanes.** A two lane road will restrict emergency egress in the event of a wildfire and murder thousands of residents. No changes to Governor Drive are warranted without a current Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive and emergency egress.

III. **The Proposed Up-zoning of the South UC Shopping Centers Must be Reduced**. The City proposed Sprouts and Vons shopping centers change to a zone to CC-3-8, with 0-73 dwelling units per acre is flawed. This zoning allows 100 foot-high structures with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The proposed plan does not consider that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City must reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV**. Customer Parking Must be Maintained at South UC Shopping Centers**. The current quantity of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling

unit. The revised University CPU must contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. **The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers**. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable because it is located in La Jolla along Torrey Pines Road far away from any UC residential neighborhoods.

VI. **A Greater Number of Solutions are Needed for Larger, Usable Park Space**. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII**. The City's Argument that People will Give up their Cars for other forms of transportation is Groundless.** No studies exist to indicate that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities because the patrons are too young and old. There are no provisions that allow emergency evacuation in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's attempt to suggest that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work is ridiculous.

VII. **The University CPU Must Address Wildfire Evacuations & Safety**. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. The DEIR has no analysis of current and projected emergency response times. UC is already behind city targets to implement adequate fire and safety coverage. More than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for emergency and evacuation services, and provide fire safety infrastructure and additional vehicular egress is completed before further density is increased.

VIII. **The University CPU Must to Take into Account UC's Vulnerability to Wildfires**. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor

how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development. Reducing vehicular access on Governor Drive exponentially increases the risk of successful emergency evacuation.

IX**. Housing Affordability Must Be a High Priority.** Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. **The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements.** A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Tom Cartier
UC Fire Safe Council, Treasurer
Standley Community Recreation Group, Representative
University City Parks Committee, Vice President

From:	Greg Gibsen
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Sunday, April 28, 2024 11:34:54 PM

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Hello planning team,

I want to re-iterate comments about the plan (University Community Plan Update (University CPU)) that myself and all the other residents I've talked to have.

Please read and incorporate this feedback into the next revision of the plan. It is ranked in priority order starting w/ numeral I. as the highest priority for implementing change:

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

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VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Thank you
Greg Gibsen
6156 Tamilynn St San Diego 92122

From: Alex Tahan
To: PLN University Community Plan Update
Subject: [EXTERNAL] Draft of University Community Plan Comments
Date: Sunday, April 28, 2024 11:10:37 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

As a UCSD student and San Diego native, I fully support the draft community plan update which reimagines the University City community as a more affordable and climate friendly neighborhood. I also support the changes made to the second draft, including the bus lanes along Genesee Avenue to the 52

However, I request that the Higher Density Alternative studied in the DEIR and found to be superior to the Draft be continued forward as well. A higher density alternative was studied in earlier phases of the update process and was voted by the overall University Community as the preferred alternative. In a time where the world is in a major climate crisis and San Diego has extreme affordability problems, we shouldn't take half measures when a better alternative is available.

Lastly, the improvements mentioned in the draft need to have better guarantees for implementation. I understand that the community plan is not an implementation plan, but too many times in the past changes have not occurred despite being in community plans. There should be guarantees that bike and bus lanes be implemented as soon as possible, especially since they require very little cost. (For reference, the bus lanes on El Cajon Blvd only cost around $100,000).

Alex Tahan

From: Debbie Ramirez
To: PLN_PlanningCEQA
Cc: Gloria, Todd; CouncilMember Kent Lee; CouncilMember Joe LaCava; Lukes, Suchitra
Subject: [EXTERNAL] Comments to University Community Plan Update Draft EIR
Date: Sunday, April 28, 2024 10:53:25 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Subject: Comments to University Community Plan Update Draft EIR

To Whom It May Concern:

I am a current resident of University City and have lived here for 24 years. I have become a part of this community and have supported all groups and schools that make this community a wonderful place to live in. I am concerned that the changes being proposed within the University Community Plan Update Draft EIR will not improve the community but they will make it a much less desirable and safe area to live in.

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access

within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. <u>School Requirements from the San Diego School District Must Be Met</u>. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

IV. <u>The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis</u>. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. <u>The City Should Prepare a DEIR Specific to the University CPU</u>. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the

DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. <u>The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts</u>: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,

Deborah Ramirez
4533 Huggins Street
San Diego, Ca 92122

From: Marcia Fisher
To: Causman, Nathen
Subject: [EXTERNAL] University City Density Increase Plans Objection
Date: Sunday, April 28, 2024 10:17:34 PM

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Nathan,
Please see below the letter sent in opposition to the expanded UC density plan.
Sent from my iPhone

From: mawf41@gmail.com
Date: April 25, 2024 at 5:28:59 PM PDT
To: kentlee@sandiego.gov, mayortoddgloria@sandiego.gov, planningceqa@sandiego.gov, ncausman@sandiego.cov, tomlins@sandiego.gov, slukes@sandiego.gov
Subject: University City Density Increase Plans Objection

Dear San Diego County Residents Representatives,

As a long-standing University City resident, I am contacting you to express my objections regarding several areas of concern from the City's recent Environmental Impact Report, some of which were already rejected by UC residents when the 'Housing Action Plan' which was part of State Bill 10 that failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to

evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day. Also, there are already several high-rise residential projects that have been built in the small radius of UTC space over the last 10-20 years. It has increased the density tremendously while taking away needed infrastructure. I used to be able to walk to the grocery store. Now, I have to get in my car and fight traffic to get to the grocery store while also dealing with a bunch of college students, We do not want or need more high rise residential in this area because UCSD wants more housing for their students. Millions were spent on a trolley system to allow people to live in different parts of the county and get to work via mass transportation or vice versa. Let's put that project to work in other areas of the county for this underutilized resource. As an alternative, other areas closer to Hwy 52 that have several older apartment and condos should be redeveloped before anything else is added or developed in UTC.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned, sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas. This is NOT acceptable. We, **the people**, have already voted this down!

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Planning Deficiencies in Parks

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans.

The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas. This is **NOT** acceptable!

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Marcia Fisher

Cambridge Terrace HOA

From:	Mary Mathis
To:	PLN University Community Plan Update
Subject:	[EXTERNAL] University City plan for South University City
Date:	Sunday, April 28, 2024 9:57:37 PM

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I live in South University City and find it impractical to consider cutting single family home lots to accommodate 4 dwelling units, without garages which puts extra cars on the streets. Giving a developer a break on fees, makes it possible for them to make money on the houses and they won't be affordable because of the higher cost of the property. The plan to build apartments over the shopping center sounds feasible until you consider there is no parking and in the process of construction, we may lose both of our grocery stores, Sprouts on the western end of Governor and Von's on the eastern end of Governor off Genesee. This would be a big loss adding to driving out of our neighborhood to obtain groceries. Construction sites in shopping centers always drive customers to shop elsewhere rather than worry with the upset in trying to park.

In addition if this apartment building takes place increasing population in South University City, how can you consider cutting Governor 'Dr, down to 2 lanes instead of the four it has now to support bike lanes? At rush hour now with traffic traversing from Genesee to Regents Rd. to avoid the traffic congestion on Genesee and to connect with West side of Clairemont and Hwy. 52 is significant. It seems with the shortage of funding for repairs on roads and filling potholes that this money could be better used for that purpose.

Sincerely,

Mary Mathis
5640 Sandburg Ave.
San Diego, CA. 92122

From: Dongdong
To: Causman, Nathen
Subject: [EXTERNAL] Response to City"s latest EIR
Date: Sunday, April 28, 2024 9:52:36 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Mr. Causman,

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

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Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Sincerely,
Dongdong Dong
Owner, 8168 Avenida Navidad, #21
La Jolla City Club HOA

From:	Angie Grosland Jones
To:	PLN University Community Plan Update
Cc:	CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com; Gloria, Todd
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Sunday, April 28, 2024 9:04:57 PM

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To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts

center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,
Angie Jones
University City resident

92122

From:	Richard Slater
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Causman, Nathen; CouncilMember Joe LaCava; Tomlins, Coby; Lukes, Suchitra; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments on University City Plan
Date:	Sunday, April 28, 2024 8:55:27 PM

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To those addressed:

1. Proposed Housing Density. The city of San Diego's planned housing density increase of 30,480 housing units to the existing 26,520 housing units for a planned total of 57,000 units is in itself unreasonable on many fronts. To point to just a few flaws.

a. Population increases of 65,360 people is unsustainable.
b. Infrastructure, as is and planned, will no support such an increase.
c. Energy demand will be stressed and succumb to failure(s).
d. Existing hospitals, universities, schools and fire/safety cannot support such plans.
e. Recreation and entertainment venues will be lacking.

2. Proposed Governor Drive changes. The city of San Diego's proposed changes to Governor Drive is flawed in respect to:

a. Existing 4 lanes to 2 lanes. The SANDAG's Series 14 VTM forecast is 8 years old and does not reflect current traffic activity.
b. You have three lower grade schools and one high school impacting the traffic load/patterns on Governor Drive.
c. Regents Road Bridge (Regents Road/Clairemont Drive Connection) should be brought to the forefront for traffic relief for the whole community.

3. Proposed increase of "bicycle" lanes and "public" transportation

a. No studies have been produced that indicate the populist have a demand for such convenience now or in the future.
b. Elderly residents cannot rely on public transportation to perform grocery shopping as planned. i.e. perishable items related to "wait times".
c. Increase "the transit area" to a mile from a Transport Priority Area rather than the existing half mile will not work in an area that SFR.

4. UC exposure to natural disasters

a. UC has approximately 75% exposure to the "Very High Fire Hazard Severity Zone.
b. Proposed University CPU does not address the population increase as it relates to exposure to, safety of or evacuation scenarios.
c. As it stands now, and in future planning, there are no "adequate" egress scenarios from University City.
d. University City consist of many heavily brushed canyons that are sitting time bombs for high wind events that cannot be adequately protected.

5. UC up-zoning of existing Sprouts/Vons shopping center

a. Shopping plaza's proposed zoning change to a CC-3-8 with 0-73 dwelling units per acre.

b. That change would allow a 100 feet high structures with a 10-foot set back from adjacent SFR.
c. That change would allow as many as 572 new units be added to Sprouts and 373 units at Vons.
d. The Sprout's hopping plaza is not within the Transit Priority Area.
e. Sprouts needs to be reduced from the planned height of 40 feet and Vons to 50 feet. With housing density to 0-54 dwellings per acre.

6. UC Planning verses funding

Monies have been spent on the University CPU planning; visual renderings/illustration for the public consumption with little exposure to projected "funding" requirements for such an endeavor and the source of such funding! The last 2 City of San Diego budgets have resulted in "Unfunded Liabilities" and continued "repurposing" of such funded purposes.

NOTE: SB 9 passed in 2021 allows single family homeowners to split their lots in two and build homes on each lot allowing up to four units in each lot previously zoned for just one. Recently a Los Angeles County Superior Court judge has ruled that this rule is unconstitutional because it interfered with their local authority over land use and zoning. This action is expected to expand statewide.

Sincerely,

Richard S.
University City resident

Richard S.

From: Michael Kozma
To: PLN University Community Plan Update; Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject: [EXTERNAL] University Community Plan Comments
Date: Sunday, April 28, 2024 8:51:12 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

My name is Michael Kozma, I am a resident of University City, and I am submitting comments on the University Community Plan Update. I support the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.
6. Governor Drive should not be reduced to two lanes, or one lane in each direction. The latest Draft UCP describes Governor Drive as a major arterial

roadway. The very wording of major arterial necessitates higher capacity than any other residential street. Given the topographical variance in University City, improving bike infrastructure will not allow a complete transition to biking.

7. Within the Draft UCP, it is stated that existing public transit can be utilized to reach the high paying biotech jobs in the region. In many cases, for biotech employers including Qualcomm, Pfizer, and Ilumina, there is insufficient public transit for daily commutes. There either needs to be a strong investment in public transit within University City, or an understanding that the employees of the region can not easily ditch their cars.

Thank you for your consideration of my concerns. I would like to reiterate my support for the more formal and extensive comments that Help Save UC submitted to your office on April 27th, 2024.

Michael Kozma

From:	Richard Slater
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; ltomlins@sandiego.gov; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gamil.com
Subject:	[EXTERNAL] Revised UCPlan Update; comments related to
Date:	Sunday, April 28, 2024 8:37:45 PM

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To those addressed:

1. Proposed Housing Density. The city of San Diego's planned housing density increase of 30,480 housing units to the existing 26,520 housing units for a planned total of 57,000 units is in itself unreasonable on many fronts. To point to just a few flaws.

a. Population increases of 65,360 people is unsustainable.
b. Infrastructure, as is and planned, will no support such an increase.
c. Energy demand will be stressed and succumb to failure(s).
d. Existing hospitals, universities, schools and fire/safety cannot support such plans.
e. Recreation and entertainment venues will be lacking.

2. Proposed Governor Drive changes. The city of San Diego's proposed changes to Governor Drive is flawed in respect to:

a. Existing 4 lanes to 2 lanes. The SANDAG's Series 14 VTM forecast is 8 years old and does not reflect current traffic activity.
b. You have three lower grade schools and one high school impacting the traffic load/patterns on Governor Drive.
c. Regents Road Bridge (Regents Road/Clairemont Drive Connection) should be brought to the forefront for traffic relief for the whole community.

3. Proposed increase of "bicycle" lanes and "public" transportation

a. No studies have been produced that indicate the populist have a demand for such convenience now or in the future.
b. Elderly residents cannot rely on public transportation to perform grocery shopping as planned. i.e. perishable items related to "wait times".
c. Increase "the transit area" to a mile from a Transport Priority Area rather than the existing half mile will not work in an area that SFR.

4. UC exposure to natural disasters

a. UC has approximately 75% exposure to the "Very High Fire Hazard Severity Zone.
b. Proposed University CPU does not address the population increase as it relates to exposure to, safety of or evacuation scenarios.
c. As it stands now, and in future planning, there are no "adequate" egress scenarios from University City.
d. University City consist of many heavily brushed canyons that are sitting time bombs for high wind events that cannot be adequately protected.

5. UC up-zoning of existing Sprouts/Vons shopping center

a. Shopping plaza's proposed zoning change to a CC-3-8 with 0-73 dwelling units per acre.
b. That change would allow a 100 feet high structures with a 10-foot set back from adjacent SFR.

c. That change would allow as many as 572 new units be added to Sprouts and 373 units at Vons.
d. The Sprout's hopping plaza is not within the Transit Priority Area.
e. Sprouts needs to be reduced from the planned height of 40 feet and Vons to 50 feet. With housing density to 0-54 dwellings per acre.

6. UC Planning verses funding

Monies have been spent on the University CPU planning; visual renderings/illustration for the public consumption with little exposure to projected "funding" requirements for such an endeavor and the source of such funding! The last 2 City of San Diego budgets have resulted in "Unfunded Liabilities" and continued "repurposing" of such funded purposes.

NOTE: SB 9 passed in 2021 allows single family homeowners to split their lots in two and build homes on each lot allowing up to four units in each lot previously zoned for just one. Recently a Los Angeles County Superior Court judge has ruled that this rule is unconstitutional because it interfered with their local authority over land use and zoning. This action is expected to expand statewide.

Sincerely,

Richard S.
University City resident

From: Zdravko Lukic
To: PLN_PlanningCEQA
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] comments to the City of San Diego"s University Community Plan
Date: Sunday, April 28, 2024 8:24:19 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern: Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR): I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant. III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not. IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative. V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to

an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update. VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts : The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.
Thank you for the consideration. As a large family we are strongly affected by these unnecessary changes to our community given that we need a quick and fast access to our schools and work places.

Sincerely,
Zdravko Lukic
Santa Cocepcion Huerta Olivares

Address: 6682 Red Deer St, San Diego, 92122

From: Stephanie Webber
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Sunday, April 28, 2024 2:54:28 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage.

The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Stephanie Webber, resident

5556 Stresemann St
Same Diego, CA 92122

From:	Carmella George
To:	PLN University Community Plan Update
Subject:	[EXTERNAL] Fw: University City Housing Action Plan and Environmental Report
Date:	Sunday, April 28, 2024 2:36:37 PM
Attachments:	UTC Resident letter to UTC Board 4_2024.pdf

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Please see the attached with my response to the Environmental Impact Report for University City.
Thanks for your consideration.

Carmella George Cotta-Owner
La Jolla City Club since 1989

From:	Broide, David
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee; Broide, David
Subject:	[EXTERNAL] Resident of UC Comments on the University Community Plan Update
Date:	Sunday, April 28, 2024 2:25:22 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

We are submitting comments on the University Community Plan Update.

I support all of the comments submitted by Help Save UC.

I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Thank you.

Yours sincerely,

David and Deborah Broide
3365 Willard Street,
San Diego,
CA 92122

From:	Neeta Prashant
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Sunday, April 28, 2024 2:17:34 PM

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To the UC planning committee and city officials:

Please find my comments below to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts estimate that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. UC is already 98% developed. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. Quality of life and safety of existing residents and their children will deteriorate significantly because of increased traffic density and lack of adequate parking. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could

be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require two residential parking spaces per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were

originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what specific conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households. The noncommittal language sounds like a giveaway to developers to maximize their profits rather than truly making housing affordable.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Neeta & Prashant Kantak
3262 Millikin Avenue, San Diego, CA 92122
Tel: 858-638-7595

From: Susan J Nelson
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; CouncilMember Joe LaCava
Subject: [EXTERNAL] Comments on University Community Plan Update
Date: Sunday, April 28, 2024 2:13:29 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80%

of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

The City should revise the DPEIR to address these issues.

Sincerely,

Susan Nelson
University City Resident

Sent from my iPhone

From: fswayz@aol.com
To: Causman, Nathen
Subject: [EXTERNAL] University City
Date: Sunday, April 28, 2024 1:00:43 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Planning Department Member Causman:

As a University City resident, I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report. There are several key concerns, some of which already were rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. The following are some of those concerns:

Governor Drive Lane Reductions
The City acknowledged at a recent meeting in early April that, while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets." It has been confirmed that the City has not done a comprehensive Traffic Study since 2015, and is basing the Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress
Related to the Governor Drive lane reductions when combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time or, worse yet, if residents need to evacuate in the event of a disaster. The area already is in a potential wildfire zone and faces proximity to MCAS Miramar, to name just two factors. Again, the City is legally obligated to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive
Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing. Such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances
The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights at the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas. That alone will further impact all f mobility along Governor Drive and onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is envisioned for the Sprout's shopping plaza. The

Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Planning Deficiencies in Parks
Under the City's "Master Plan," the UTC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

In summary, these initiatives ignore the need for a workable and supportive infrastructure. They fail to provide even somewhat affordable housing, disregard existing residents' input, and intentionally erode single-family neighborhoods. The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and contained no parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balances growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in the decision-making process.

Sincerely,
Frank Swayze, Member
Nobel Terrace Villas de Oro Homeowners Association

From:	Carmella George
To:	Causman, Nathen
Subject:	[EXTERNAL] Environmental Impact Report
Date:	Sunday, April 28, 2024 12:07:34 PM
Attachments:	UTC Resident letter to UTC Board 4_2024.pdf

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Mr. Causman,

Please see the attached with regard to the Environmental Impact Report for University City.
Thanks for your consideration.

Carmella George Cotta-Owner
La Jolla City Club since 1989

From: Kathy Chevalier
To: PLN_PlanningCEQA; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; Gloria, Todd
Subject: [EXTERNAL] UC
Date: Sunday, April 28, 2024 11:56:43 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern: Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR): I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant. III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not. IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred

alternative. V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update. VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts : The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program. Name Kathy and Chuck Oliver Address 5468 Pire Ave 92122

From: Andrea Lehman
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Sunday, April 28, 2024 10:41:49 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs

to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than

doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Andrea Lehman, 92122 homeowner since 2008, mother of three local school children

From: Bill Breher
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; CouncilMember Joe LaCava
Subject: [EXTERNAL] Comments on the Second Draft of the University Community Plan
Date: Sunday, April 28, 2024 9:36:27 AM

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To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery

use.

Sincerely,

William Breher and Joan Breher
3295 Welmer Place
San Diego, CA 92122

From: dianevoit@gmail.com
To: PLN_PlanningCEQA
Cc: Gloria, Todd; CouncilMember Kent Lee; Tomlins, Coby; Lukes, Suchitra; Galloway, Tait; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to University Community Plan Update Draft EIR
Date: Sunday, April 28, 2024 7:43:28 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,

Diane Voit

From:	Joseph Risse
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Re: Comments to Revised University Community Plan Update
Date:	Sunday, April 28, 2024 7:07:43 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am submitting additional comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
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5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a

minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Thanks,

Joe Risse

On Thu, Apr 25, 2024 at 9:59 AM Joseph Risse <jprisse57@gmail.com> wrote:

> To Whom It May Concern:
>
> Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):
>
> I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.
>
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>
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Sincerely,

Joseph Risse
3580 Stetson Avenue
SD, CA 92122

From: Sue Gilmor
To: PLN_PlanningCEQA; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; Gloria, Todd; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Governor Road
Date: Sunday, April 28, 2024 12:13:29 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern: Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR): I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant. III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not. IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative. V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate

policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update. VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts : The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

S. Gilmor
Sent from my iPhone

From: Nancy Beck
To: PLN University Community Plan Update; Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee; Tomlins, Coby; Lukes, Suchitra; Galloway, Tait; Causman, Nathen
Subject: [EXTERNAL] Comments to the University Community Plan Update
Date: Saturday, April 27, 2024 7:57:29 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in

the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Nancy Beck
3695 Syracuse Ct
San Diego, CA 92122

Sincerely,

I APPRECIATE ALL REFERRALS!

Email: nancybeckrealestate@gmail.com | Call me at 858-945-5478 | NancyBeckRealtor.com |
app.realtyonegroup.com/Nancy.Beck

From: C Mylett
To: PLN University Community Plan Update
Cc: mayortoffgloria@sandiego.gov; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject: [EXTERNAL] Help save UC
Date: Saturday, April 27, 2024 7:21:58 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern;

I am a long time homeowner and resident of UC and submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54

dwelling units/acre.

4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Regards,
Dr C.A. Mylett

Sent from my iPhone

From:	R Bush
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject:	[EXTERNAL] Comments University Community Plan Update
Date:	Saturday, April 27, 2024 7:18:04 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all the comments submitted by Help Save UC. I especially want to highlight the following:

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5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of the ground floor building area for post offices, pharmacies, and community-serving retail, food, beverage, and grocery use.

Sincerely,

Ruth Bush

2913 Ducommun Avenue

San Diego, CA 92122

ruthbush@alumni.princeton.edu

From:	T. Broderson
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject:	[EXTERNAL] Comments on the University Community Plan Update
Date:	Saturday, April 27, 2024 6:02:26 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
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5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

So far, it does not appear as if the city has taken the concerns of the *residents of University City* into consideration at all in its headlong rush to ram this project through. I have commented on this project multiple times and have never received a response. It's incredibly concerning that the city simply intends to maximize population density with no plans for how to accommodate the impact of exponential population growth in this area (fire? safety? massive amounts of traffic because they absolutely will bring cars? hello?). Further, that the City does so without presenting any evidence that the project will accomplish the stated goals, i.e. to make housing more affordable (as opposed to creating units for investors to snap up) and to reduce emissions (when studies show people simply do not walk to public transit over a mile away.) San Diego essentially concedes this when it boasts it is "innovating" a new approach to managing cities - but the residents of University City should not be treated as lab rats. I don't know where Mr. Gloria, Mr. LaCava, and Mr. Lee reside, but I suspect they either are NOT facing what University City residents are facing, have CHOSEN to live in a high-density area, or more likely, can easily afford to move if their neighborhood suddenly changes out from under them. I would not have moved into this neighborhood had I been able to see into the future and known what the City was planning. It's incredibly frustrating to face the destruction of the neighborhood now.

Sincerely,
Tahra Broderson
3196 Carnegie Place
San Diego, CA 92122

From: Sharon Simmonds
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee
Subject: [EXTERNAL] University Community Plan update
Date: Saturday, April 27, 2024 2:55:36 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

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units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.

5. Development on any property designated “Community Village” in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Regards,
Sharon Simmonds
3739 Cascade Ct
San Diego CA 92122

From:	Gary Higganbotham
To:	CouncilMember Kent Lee; Nguyen, Dustin; Burton, Zach; Gloria, Todd; PLN University Community Plan Update; CouncilMember Joe LaCava
Subject:	[EXTERNAL] Overdensity Rentals Destroys Family Neighborhoods
Date:	Saturday, April 27, 2024 1:13:11 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Zoning laws that allow single family residents to be converted into multi unit tiny apartments cheapens neighborhoods. It creates a buying frenzy for developers wanting snatch up all available properties shutting first home buyers out. Renting forever does not build equity for families. Your policies go against family values. You are turning University City into a sea of tiny rentals. YIMBY is all about greed it is not about housing the needy. Please change your positions to better support families who want to make University City their long term home where they can OWN a property and build equity.
Sent from my iPhone

On Apr 27, 2024, at 11:51 AM, Gary Higganbotham <ghigganbotham@aol.com> wrote:

To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
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5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Sent from my iPhone

From: myjamidog (null)
To: PLN University Community Plan Update
Cc: CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com; Gloria, Todd
Subject: [EXTERNAL] Comments to University Community Plan Update Draft EIR
Date: Saturday, April 27, 2024 1:09:56 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School

District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,
Kathy Marty
6014 Tulane Street
San Diego, Ca 92122

Sent from my iPad

From: Don Danner
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject: [EXTERNAL] Fw: Comments to University Community Plan Update
Date: Saturday, April 27, 2024 12:53:23 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village" in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Sincerely,

Donald Danner
53 year resident of University City Community
5433 Dalen Avenue
San Diego, 92122

From:	Keebler Dawg
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; University City Peeps
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Saturday, April 27, 2024 12:33:07 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am in full agreement with UC Neighbors for Responsible Growth, a.k.a. UC PEEPS' intelligent comments on the City of San Diego's revised University Community Plan Update (University CPU) and respectfully ask that you take them into consideration when you come back with your final draft:

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties,

and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the

budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Keebler Dawg
Resident & Property Tax-paying Homeowner
University City

From: Gary Higganbotham
To: CouncilMember Kent Lee; Nguyen, Dustin; Burton, Zach; Gloria, Todd; PLN University Community Plan Update; CouncilMember Joe LaCava
Subject: [EXTERNAL] City Plan - please do not destroy our family neighborhoods with overcrowding and developer greed
Date: Saturday, April 27, 2024 11:51:39 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

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setbacks must be 30 feet from adjacent properties.

5. Development on any property designated “Community Village” in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

Sent from my iPhone

From:	Help Save UC
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee; Tomlins, Coby; Causman, Nathen; Chris Nielsen; Andrew Wiese
Subject:	[EXTERNAL] Comments on the 2nd Draft of the University Community Plan
Date:	Saturday, April 27, 2024 11:34:45 AM
Attachments:	2024-04-27 HelpSaveUC Comments on 2nd Draft UC Plan + appendix.pdf

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Planning Department / Ms. Lukes,

Please find attached our comments on the Second Draft of the University Community Plan released in March 2024. For your reference, we have included our previous comment letter, dated May 4, 2023, as an appendix.

Regards,

Help Save UC

From: Roxieann Danner
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee
Subject: [EXTERNAL] Comments to University Community Plan Update
Date: Saturday, April 27, 2024 11:27:12 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

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Sincerely,

Roxieann Danner
55 year resident of University City Community
5433 Dalen Avenue
San Diego, 92122

From: rsted@san.rr.com
To: Gloria, Todd
Cc: CouncilMember Kent Lee; PLN_PlanningCEQA; Causman, Nathen; Lukes, Suchitra; "tomlins@sandiego.gov"
Subject: [EXTERNAL] Response to San Diego"s Density Increase Plan
Date: Saturday, April 27, 2024 11:07:44 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To those noted above:
As University City residents, my wife and I are contacting you to express our objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the "Housing Action Plan" part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets". It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

Several years ago, a proposal recommending the completion of the Regents Road Bridge over Rose Canyon was defeated at the ballot box. Given the massive construction of apartments that has taken place both on the UTC mall property and the two major towers completed on the southwest side of La Jolla Village Drive and Genesee, it would seem appropriate to reconsider the Regents Road Bridge completion as a necessary project to alleviate the

expected traffic gridlock that would result from the addition of several new high-density projects under consideration.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor/Genesee to100 feet or 10 stories with residential units added to those areas. That alone will further impact all kinds of mobility along Governor Drive and onto Genesee as well as to the 805 to the east, and Regents toward the west where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Thank you for your time and consideration. Such initiatives call for planning that balances growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Sincerely,

Richard L Sted
Nancy L Kline-Sted
Cambridge Terrace Association
4411 Caminito Sana Unit #1
San Diego, CA 92122-5415

From: Kendra Cole
To: PLN University Community Plan Update; Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee; Helpsaveuc Info
Subject: [EXTERNAL] Comments on Second Draft of the Plan
Date: Saturday, April 27, 2024 11:05:48 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC. I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.
5. Development on any property designated "Community Village"

in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

It is imperative that current University City residents have a say in how we want our community expanded. We have purchased our homes in this community, invested in all aspects of it including education, businesses, community events, etc. We feel our voices need to be heard and included. I fully support all the efforts of the Help UC committee. They have been very inclusive and considered of all UC residents.

Please respect our requests.

Thank you,
Kendra Cole
4877 Cinta Court - UC Resident

From: Jason Strimpel
To: PLN University Community Plan Update
Subject: [EXTERNAL] Please Do Not Ruin University City
Date: Saturday, April 27, 2024 10:58:21 AM

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I implore you to please listen to the community of University City and represent us in the following: Do not change Governor Drive to be one lane in each direction. Find another way to add your bike lanes. There are three schools along Governor Drive and a very busy Recreation Center and competitive aquatic center. If you were to visit Governor Drive in real time during pick up and drop offs, you would see for yourself that reducing to one lane in each direction is a terrible idea. In addition, it threatens the well being, safety and ability for emergency services to reach our community. Governor Drive must remain 4 lanes. Do not destroy our neighborhood with the threat of high rise buildings at our shopping centers. The majority of the community and the property owners that live adjacent to these centers have serious concerns about how this will negatively affect their quality of life, homes and property values. You must reduce the height limit zoning at Sprouts Shopping Center to 40 feet and the housing density to 0-29 du/ac and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54.

Sincerely,
Jason Strimpel
2966 Briand Ave, San Diego, CA 92122

From:	Kristi
To:	PLN_PlanningCEQA
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava
Subject:	[EXTERNAL] TO STOP REDUCTION OF GOVERNOR DR LANES AND MINIMIZE BUILDING AT SPROUTS AND VONS SHOPPING CENTERS
Date:	Saturday, April 27, 2024 9:47:33 AM

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Please Stop this nonsense! There are 3 schools within a half a mile, two directly off Governor. There are also ball fields, parks, tennis courts, a basketball auditorium and a recreation center and pools on Governor!! There are three freeway entrances, two shopping centers and a main road, Genesee going through Governor and when there is a evacuation we will not be able to get out. There was a jumper over the 5 a few weeks ago and most residential streets were blocked with cars trying to get around the grid lock on Genesee and Governor this went on for an hour. If there was a first responder, they weren't getting through. Our area already had first responder access issues and now you want to add more residences and cut back the main commuting streets for? Where is this logic?

I suggest you put this money and efforts into improving upon the areas of San Diego that beg for improvement and can offer more affordable housing. Improve upon the schools, communities, roads and law enforcement in the areas that are more affordable to live.
This plan is destructive and detrimental, it's not improvement!

Thank you,

Kristina Dangelo

From:	Sera Nagel
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Tomlins, Coby; Lukes, Suchitra; CouncilMember Joe LaCava; universitycitypeeps@gmail.com; Causman, Nathen; Galloway, Tait
Subject:	[EXTERNAL] Comments to University City Plan
Date:	Friday, April 26, 2024 11:41:03 PM

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Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):
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more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.
II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.
III. The Proposed Up-zoning of the South UC Shopping Centers Should be
Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.
IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept

available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.
V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC

residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded . There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as
tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

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X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Seraphim Nagel

Sent from my iPhone

From:	Peter Nagel
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Tomlins, Coby; Lukes, Suchitra; CouncilMember Joe LaCava; universitycitypeeps@gmail.com; Causman, Nathen; Galloway, Tait
Subject:	[EXTERNAL] Comments to University City Plan
Date:	Friday, April 26, 2024 11:39:57 PM

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San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

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Sincerely,

Peter Nagel

Sent from my iPhone

From:	PENELOPE NAGEL
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Tomlins, Coby; Lukes, Suchitra; CouncilMember Joe LaCava; universitycitypeeps@gmail.com; Causman, Nathen; Galloway, Tait
Subject:	[EXTERNAL] Comments to University City Plan
Date:	Friday, April 26, 2024 11:38:53 PM

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_____

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Sincerely,

Penelope Nagel

From:	Jeanne Hoey
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Friday, April 26, 2024 8:06:00 PM

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To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS'

budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Kenway & Jeanne Hoey/6141 Agee St.

From: cbeacom@san.rr.com
To: PLN University Community Plan Update
Subject: [EXTERNAL] University Draft Plan Comment
Date: Friday, April 26, 2024 5:54:20 PM

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I am a homeowner in University City and although we are a minority, there are some of us who welcome the proposal to change Governor Drive from 4 lanes to 2 lanes. I believe it will create disincentives for commuters to use it and will slow down traffic in general, both which will help maintain property values along Governor Drive (unlike Clairemont Drive when it became a major thoroughfare). I wonder if those who are opposed realize that. It might even create an incentive for kids who live nearby to walk home from school if they can do it safely (not all can). I keep thinking about the La Jolla Blvd in Bird Rock and how lovely it is since it was reduced, and traffic circles were put in. And even Moraga Blvd's traffic circles; while less lovely are better than stop signs. While I agree with the majority of the community on the density, I may feel differently than most who you are hearing from, about reducing Governor Drive and I wonder if its benefits have been presented to our community appropriately or if that got lost in the shuffle.

Thank you,
Crunchy Beacom
858.337.5247

Luann Beacom MSN, MPH, FNP, CNS, C-EFM

From:	Earl Kline
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; UC PEEPS
Subject:	[EXTERNAL] real-life examples why not to proceed with UC Community Plan update
Date:	Friday, April 26, 2024 3:51:02 PM

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In a short distance on Governor Drive, there is The Marketplace , Spreckels Elementary, Fort Field Little League baseball field,
Standley Recreation Center, Swanson Memorial Pool, Standley Aquatic Center, Jim Carl Field,
 Standley Middle School,
All Saints Lutheran Church, Chabad Center of University City, University Square,
Chase Bank, University Community Library, Curie Elementary. University City High School is just off Governor.

All these facilities attract groups and families who drive in their cars. All lanes of Governor are frequently full.
People come from all over San Diego for some of the sports events.
It is not reasonable to expect large groups of people to ride bicycles.
There aren't enough buses to replace the cars.
There are many older people in the community who depend on cars to go shopping. They couldn't ride bicycles if they wanted to.

Please keep Governor Drive as it is.

Thanks you,
Earl Kline
5873 Scripps St
San DIiego CA
92122

From:	Jennifer Dunaway
To:	PLN_PlanningCEQA
Cc:	Tomlins, Coby; Lukes, Suchitra; Bonnie Kutch; Burton, Zach; CouncilMember Kent Lee
Subject:	[EXTERNAL] Fw: UC PEEPS" Comments on University Community Plan Update Draft EIR
Date:	Friday, April 26, 2024 3:19:42 PM
Attachments:	2024 Draft Mobility Technical Report Review - April2024.docx

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Planning Department:
Note since July 2023, the City Planning staff removed the Community preferred scenario from discussion. Why? This should have been included in the DEIR as an alternative. There is no rational reason why it was not included since so much effort was placed into it and the subcommittee pushed it forward in July 2023.
This needs to be included as an Alternative in the DEIR.

All of the comments below need to be integrated into the new draft EIR and UC Plan. V/R Jen Dunaway

> ----- Forwarded Message -----
> **From:** University City Peeps <universitycitypeeps@gmail.com>
> **To:** "planningceqa@sandiego.gov" <planningceqa@sandiego.gov>
> **Cc:** "kentlee@sandiego.gov" <kentlee@sandiego.gov>; "tgalloway@sandiego.gov" <tgalloway@sandiego.gov>; "ctomlins@sandiego.gov" <ctomlins@sandiego.gov>; "slukes@sandiego.gov" <slukes@sandiego.gov>; "ncausman@sandiego.gov" <ncausman@sandiego.gov>; "joelacava@sandiego.gov" <joelacava@sandiego.gov>; "mayortoddgloria@sandiego.gov" <mayortoddgloria@sandiego.gov>; Andrew Wiese <awiese@sdsu.edu>; Chris Nielsen <cn@adsc-xray.com>
> **Sent:** Wednesday, April 24, 2024 at 02:57:44 PM PDT
> **Subject:** UC PEEPS' Comments on University Community Plan Update Draft EIR
>
> To Whom It May Concern:
>
> On behalf of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, I'm submitting our combined comments on the University Community Plan Update Draft EIR (DEIR):
>
> I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. (See attachment with expert Traffic Analysis relative to Governor Drive.)
>
> II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on

Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,
Bonnie Kutch, Resident of University City
Founding Member of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, an Association of 500-plus University City Residents and Property Taxpayers

Bonnie Kutch | University City PEEPS | 619.299.1010

From:	Katie Nelson Rodolico
To:	PLN University Community Plan Update; CouncilMember Kent Lee; Burton, Zach; CouncilMember Joe LaCava; Gloria, Todd
Subject:	[EXTERNAL] University Community Plan Update (2 of 2)
Date:	Friday, April 26, 2024 2:44:22 PM

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Planning Department and Elected Officials:

The following are errors, typos, or small issues in the Draft University Community Plan.

Page 2: Missing Katie Rodolico as a subcommittee member. I represented the UCCA for the entire process as an official subcommittee member.

Page 14: UCSD LRDP is already out of date. Current enrollment is 42,436 students for fall 2023. LRDP only accounts for 42,400 students by 2035. I suspect after this year's enrollment for Fall 2024 they will exceed the 42,400 students.

Page 20: Without traffic studies of Governor drive, lane reduction is irresponsible. It is currently an LOS F with 4 lanes. Ref. Mobility plan.

Page 25: Change 'last mile connectivity' to last 2-3 miles connectivity since that is the distance for most of south UC to the 41 bus stop.

Page 29: VMT could be reduced by building the Regents road bridge. Even a foot/bike bridge would reduce GHG emissions. That would be environmentally superior.

Page 38: under the section of Resource based park - seem to be missing the second clause, or remove the word "both"... Grammatically incorrect sentence.

Page 33: parcel on regents road, west side, opposite Pennant is not in the MSCP or MHP. How is this open space? Will compensation be given to current owner for the downzoning of their parcel?

Page 33: Proposed linear parks do not show as neighborhood parks. Perhaps because they aren't really parks.

Page 33: The two churches on Eastgate Mall (Good Samaritans and La Jolla Community) and the Temple Beth Israel and high school on Town Center should all be marked institutional, the same as all the other religious sites.

Page 49, first sentence. Changed 'cater to the car' to 'catered to the car' to match the tense of the rest of the sentence.

Page 33: Torrey Pines City park (aka gliderport) should show as a city park, not a state park, on the map.

Page 33: You are missing one of the Eastgate mini-parks on the map.

Page 33: Cal Trans ROW show as institutional at 805 and governor. This is not institutional - it is weeds surrounded by on/off ramps.

Page 33: The parcel on Governor drive, across from Lakewood, and east of University Community Gardens park should show as Utility, not institutional. The water department owns this parcel. It is not a church or school.

Page 62: The graphic showing a cable car is confusing since that doesn't happen in UC… or anywhere in San Diego that I know of.

Page 65: Graphic should show drought tolerant and native plants rather than water hungry lawn and non-native trees.

Page 72: Eucalyptus trees are non-native and highly flammable. They should *NOT* be included in the tree palette for a community in a high wildfire risk area.

Page 81: Map shows a path to transit (the coaster) that is NOT open to the public for security reasons. Until it is publicly accessible, it should not be part of the plan.

Page 93: Proposed health loop cuts through La Jolla Colony greenways. These are private and signage says for residents only, no trespassing. Street view on google maps will confirm this for you.

Page 93: Cutting through La Jolla Colony does not work as path to transit, either since it is not open to the public. Again, no trespassing signs indicate it would not make a valid path to transit.

Page 95: You show a potential connection between Lakewood and Gullstrand. Connecting what? This should be shown as a proposed trail, not a proposed connection.

Page 100: Should multi-use paths be contiguous, or do you mean non-contiguous (which is pedestrian and bike unfriendly.)

Page 101: Should add a micromobility Hub near Judicial and Nobel to serve the library, rec center, Illumina, etc.

Page 104: Complete streets only work if they are close to transit. East Governor Drive has senior housing, unlikely to use micromobility hub scooters and too far from transit at Genesee.

Page 105: Under walking & rolling it states there is a lack of sidewalks. Where? This

community has great sidewalks, one of the things I love about it.

Page 105: Speaking of pedestrian bridges to make connections… A bike/pedestrian bridge across Rose Canyon at Regents would dramatically improve connectivity and connection in the community.

Page 106: Showing Regents between Governor and Lahitte as a 'path' suggests that residents of Lahitte, Millikan, Wilber, Hurd, etc would no longer be able to access their homes.

Page 110: Shows wrong existing conditions for bike lanes on Governor.

Page 110: Proposed buffered bike lane will be hard to accomplish with driveways and bus stops.

Page 110: Graphic doesn't show existing bike lanes on Genesee.

Page 110: How will access in/out of UCHS work with cycle track bike lanes?

Page 113: Remove the skyways talk. It is a pipe dream and should not be included in the plan. Higher priority should be placed in increasing coverage and frequency of existing public transit.

Page 125: Putting a neighborhood park on North Torrey Pines is bad placement. There is no residential in this area so people would have to drive to get to it, increasing GHG and VMT.

Page 117: Governor Dr, west of Regents, shows 2 lane collector with two way left turn. This is not needed. Only left turns from east bound Genesee to Regents North would be people entering the shopping center or going to Millikan or Lahitte. Not enough traffic to justify 2 left turn lanes.

Page 119: No explanation of what Community Parking Districts are in the draft plan. I assume this means metered parking for street parking. Plan should be specific about where parking will be restricted.

Page 125: "Population based parks" should be in proximity to residential areas. Proposed Torrey Pines neighborhood park is in a non-residential area.

Page 126: Who will pay for and maintain the proposed linear parks. Proposed sites are in street department right of way and they do not have a budget to develop thm.

Page 132: Private parks, specifically mentions La Jolla Colony. Signage is clearly marked with NO TRESSPASSING, so it does not qualify as a publicly accessible park.

Page 208: Table 7 is full of unfunded parks and projects. Don't allow new development till

funding is identified and allocated.

Page 208: Mandel Weiss park talks of adding 0.3 acres. Where is this acreage coming from? Explain.

Page 208: Lawrence JCC is not really publicly available since it is much more expensive than comparable public parks/aquatic centers. Review the lease when it comes due and require JCC be accessible to serve the broader community.

Page 208: Pocket parks/greenways. These are not parks if the streets department controls the land/budget/use. Stop calling them parks.

Page 140: You should include the trails from glider port to Black's beach.

Page 140": Torrey Pines City park (aka Gliderport) should show on map of parks.
Page 141: Mention of finger canyons coming up from San Clemente Canyon. Does this mean city will be responsible for brush clearing near residences as they are with Rose Canyon?

Page 154: Station 52 is NOT online yet… Still under construction. Dont' show it as currently in operation.

Page 154: Inadequate fire response for south UC. Station 50 has to navigate Genesee SB or 805 SB… if a fire happens in the afternoon the response time is inadequate.

Page 156: Preuss is public (charter) school and should be listed as public.

Page 156 " Infrastructure improvements may be necessary to ensure safe routes to schools." . There are no school buses for the kids in the Spreckels and Curie boundary maps that live north of Rose Canyon. We don't currently have safe routes to school for these children.

Page 158: Under Flooding and Sea Level rise - mentions University Community "south of the I-8". Correct this.

Page 158: Mention of the Municipal Waterways Maintenance is laughable in light of January's flooding in South San Diego.

Page 160-1: Valid discussion of mitigating fire risk. But upzoning at the Vons shopping center, when it's in a fire risk zone, seems counterintuitive. Why put in increased density in a very high fire risk zone? Same with the Sprouts shopping center. See figure 32.

Page 160: Cool zones only operate during business hours.

Page 160: Plan suggests "Resiliance Hubs" will be on the community to provide. Will the city provide these?

Page 166 and General: words like “encourage” “promote” and “consider” are meaningless and carry no weight. Why have policies that can’t be enforced?

Page 166: 1.2 C: Market rate is not affordable.

Page 167: 1.5 A: Promoting private giveaways of city land, we end up getting expensive, non-pubic-serving centers like JCC.

Page 167: 1.5 A: Reiterating that three religious institutions were not marked institutional: Good Samaritan, La Jolla Community, and Congregation Beth Israel.

Page 172: 2.18 K: Towers would not be allowed because of the coastal height restrictions.

Page 172: 2.19: Restore density proposed by subcommittee 54 du/acre 50’ height limit at Vons, 29du/acre, 30’ height limit at Sprouts.

Page 172: 2.20 D: Does this belong in the plan? It’s a good idea, but not part of planning, just a feel good idea.

Page 172: 3.1 B: Define “cut through” traffic. Who determines if someone is cutting through?

Page 173: Section 3: Add a policy to coordinate with first responders. Ensure proposals, including traffic calming proposals (3.1 B) do not interfere with response times.

Page 174: 3.3 G: Needs analysis before removing parking.

Page 174: 3.4 A: Micromobility hubs - are they blocking the sidewalk? The bike lane? Private land? What is the hierarchy to determine where to place them at crowded intersections?

Page 174 3.6 C: Needs a full traffic study.

Page 176 3.8D - Unbundled parking is a giveaway to developers at the expense of tenants.

Page 180: 5.13 K Parcel that is east of Gullstrand is no longer a golf course, housing is going up on this site. Consider the deep canyon east of Dirac.

Page 182 6.3: Reconnaissance plan should have been done prior to plan.

Page 184 7.6 B: Translation: We don’t know what the future will bring. This is not a policy, remove it.

Page 193: SDR-1 5: In lieu fees for public amenities should not be allowed. As we’ve seen with in-lieu fees for inclusionary housing, developers will choose to pay a ONE TIME fee

rather than provide the mandated requirements. At minimum an ANNUAL fee should be required so that future owners of that parcel could later choose to add the amenity.!!!!

Page 210: Table 7.21. This is not a park. It's a strip of grass blocked by FEDEX trucks. It is in the noise contours of Miramar Air field so it is not acceptable for park space. It is in a non-residential area so it doesn't serve the local residents, and anyone silly enough to use it would need to drive (GHG/VMT) to get there.

Page 210 7.24: Sloped canyon across from a well used park. Does not meet the needs for a park.

Page 210 7:26: Joint use at Curie is hour restricted as negotiated with the residents directly adjacent. Adding in walking paths that can only be used outside school hours, during daylight hours is highly restrictive.

Page 212: 7:34: Added features already exist since Fly Torrey and Cliffhanger Cafe already exist and serve that park. Consider actually visiting the park before proposal is made.

Page 212 7:36: Given that developers are only expected to provide 50% of policy required amenities, in lieu fees are clearly a giant fail. Need to incentivize actually providing amenities. In lieu fees should be an annual payment, so that developers could decide, in the future, to provide the amenities in order to stop ongoing in-lieu fees.

Page 213 Community Summary: This shows the planned failure for providing parks. Is it a plan if you plan to fail?

Regards,

Katie Rodolico,
5906 Dirac Street,
San Diego, CA 92122
UCPUS Board member, representing UCCA
UCCA recording secretary
Native San Diegan and long term resident of University City.

From: R & L Carver
To: PLN_PlanningCEQA
Cc: CouncilMember Kent Lee; Graham, Nancy; Alo, Leo; zemens@sandiego.gov; vnguyen@sandiego.gov; CouncilMember Joe LaCava; Gloria, Todd; Galloway, Tait; Mecham, Tony; SDFD San Diego Fire Dept; david.fulcher@fire.ca.gov; ct.public.information.d11@dot.ca.gov; sdpdcentral@pd.sandiego.gov; clerkoftheboard@sandag.org; president@universitycitynews.org; PLN University Community Plan Update; universitycitypeeps@gmail.com
Subject: [EXTERNAL] DEIR Comment, University City 92122
Date: Friday, April 26, 2024 2:37:52 PM

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DEIR deadline 4/29/2024
https://www.planuniversity.org

To: UC Planning Commission, Regarding San Diego University City~

Cutting our main artery, Governor Drive, down to one lane in each direction to add an unnecessary dedicated "buses only/bike lanes" in addition to proposed mass housing on Governor...

Have you tried to get to your child in a school emergency? I have, running 4 blocks ON FOOT from my driveway, during a Granite Hills High School shooting, because there was zero vehicle access and zero cell service with News crews on the ground and helicopters in the air literally taking over all of the bandwidth, etc..!! Or, my adult child literally stuck in the fire that started in Carlsbad that took out Escondido..I was on the phone with her for 1.5 hours trying to guide her safely out, with the only safe route I could find being El Camino Real southbound. I could go on about what has gone wrong in all of my experiences here and Los Angeles; this city has been through it's fair share of catastrophes with all of the poor infrastructure to know better than to propose what you are proposing. Our first responders (copied here) already know all about trying to get to someone when their hands are tied, but **trying to get to your own child when your hands are tied is beyond everything and anything you've ever had to live through!** We had no warning!

> **Governor Drive is the only East/West artery** in the southern portion of University City. To use it for any other purpose other than a main artery borders on criminal intent for resident safety as you plan to increase housing exponentially! Your plan includes additional mass housing at Governor/Genesee along with additional mass housing at Governor/Regents to the tune of over 200 residential units **per acre**, with many residing multi-stories above the existing retail space in the plan. ADU approvals galore?! This means a potential of thousands of additional residents utilizing Governor Drive; I can't and won't unsee the RISK that restricting lanes will impose on a daily basis.
>
> UC South has minor children in three public schools, and many daycare facilities surrounding Governor Drive to evacuate, thousands of current residents, many of whom are elderly with mobility issues, in addition to the thousands more you plan to add to our small neighborhood is of critical concern. Brush, canyons, eucalyptus trees, and Rose Canyon fault lines surround us making us susceptible to catastrophic events. We all have huge

homeowners policy premiums due to the potential RISK here!

Not only have I witnessed the entire county of San Diego burn twice (which was technically two of three times this has happened here)...., but I am originally from Northridge California (Porter Ranch, 91326, homeowner 1965-current). I have lived it all - multiple fires, earthquakes, emergency evacuations, emergency vehicle access, power outages, water outages, news reporter nightmares, water trucks, limited-zero access to our homes or any resources, our police station burned to the ground in the 1971 earthquake (I've donated an entire new cot room to the LAPD Devonshire Division recently, now that I am able to do so, due to the lifelong memory of that horrible time in our lives. I will never forget it.). Many are going to avoid driving in that well-marked "buses only" lane in an emergency, that is if we can make it onto Governor Drive in our vehicles while parents, first responders, and news vans try desperately to get in. I have spent 15 years of my career working in private and public insurance and college Risk Management because of all I have witnessed since 1971.

I have already voiced my concerns over the entire University City plan (3/20/23 email). Our community colleges are out in the communities they serve for a reason, ACCESS. In addition, a vast majority of college classes are online/hybrid now and do not command an onsite presence or need for additional housing to accommodate incoming businesses, students, or staff. Proposed census projections are for a marked decrease in the San Diego population! UCSD should be required to research and open satellite campuses throughout San Diego so that their students can live, work and take UCSD classes in their own neighborhoods..not the other way around. Perhaps an educational **cohort with SDCCD and SDSU, to accommodate their students by combining class locations and utilizing empty buildings and classrooms already available throughout the county, SDCCD does it all day, everyday.**. There is far too much waste in California coupled with threats over "demands on water and power," so you say, to continue funding and permitting more projects requiring more. We all know there are plenty of vacant, starving commercial spaces to hold classes and run businesses throughout San Diego so that commuting for all who live in this county should be a non-issue. I am not focusing on your entire UC plan in this communication; however, I will advocate for safety all day long. **We are entitled to our safety. Proposed mass housing in all of UC, including Governor Drive, while narrowing Governor Drive to one lane in both directions, should clearly be deleted.**

Ha*ve you tried to get to your child during an emergency? Have You!?*

Thank you,
Lori Carver
92122 Homeowner

cc: SD Fire, Cal Fire, CalTrans, SDPD Central, Clerk of the Board at SanDag
(I apologize if this has been copied to mailboxes that are no longer correct as I copy those I've emailed before on this subject).
SDPD, SDFIRE, CALFIRE, Caltrans, etc: This plan is clearly a Downtown 2.0 that council members and planners propose for 92122 with mass housing. I was unsure of who to direct content to at the municipalities, but felt it was important to realize the potential impact this will have due to the proposed over-development and overcrowding in all of 92122 and on Governor Drive (link to proposal is above, if you've not been made aware of this council plan)..This plan, especially for UC South,

surrounding Governor Drive, makes no economic/feasibility/safety sense as this council attempts to cater to UCSD, add more growth without resources, and above all..create their "Downtown San Diego 2.0.' Our deadline to respond to planuniversity@sandiego.gov is 4/29/24. Please join in on the meetings. Thank you!

From:	Jan Zverina
To:	Causman, Nathen
Subject:	[EXTERNAL] Fwd: Comments to University Community Plan Update -- Draft EIR
Date:	Friday, April 26, 2024 1:26:28 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hi Nathen,
I am resending this comment response regarding the City's EIR just in case. We received a response that your email was incorrect.
Kind regards,
- Jan Zverina *(yon ziv'ree'na)*
President, Nobel Terrace Villas de Oro
Vice President, Nobel Terrace Community Association

---------- Forwarded message ---------
From: **Jan Zverina** <jazverina@gmail.com>
Date: Wed, Apr 24, 2024 at 4:17 PM
Subject: Comments to University Community Plan Update -- Draft EIR
To: <planningceqa@sandiego.gov>
Cc: <mayortoddgloria@sandiego.gov>, <kentlee@sandiego.gov>, <tgalloway@sandiego.gov>, <ctomlins@sandiego.gov>, <SLukes@sandiego.gov>, <NCausman@sandiego.gov>, <joelacava@sandiego.gov>, University City Peeps <universitycitypeeps@gmail.com>

To Whom It May Concern:

Below are my comments and objections to several parts of the City of San Diego's University Community Plan Update Draft EIR (DEIR) as several of them are legally deficient:

I. Changes to Governor Drive: Converting Governor Drive from a four-lane Major Arterial to two-lanes may actually fail the legal test because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. **No changes to Governor Drive can be made without a current Traffic Analysis and VMT performed at peak hour traffic times.**

II. Emergency Access/Ingress:
Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as it's proximity to MCAS Miramar, just to name two factors. **The City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.** Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met: The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU

area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. **Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.**

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. **The DEIR needs to be revised to include the community's preferred alternative.**

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. **The DEIR should be separated into three separate EIRs for each proposed plan update.**

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. **Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.**

I hope that this time around the City does seriously welcome thoughtful input and inclusion from residents!

Jan & Valerie Zverina
4325 Via Monclova
San Diego CA 92122

From: Nicholas Levy
To: Causman, Nathen
Subject: [EXTERNAL] Increased housing density plan - please reconsider
Date: Friday, April 26, 2024 1:26:01 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Nathen Causman

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without
a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the
schools let out and parents are attempting to pick up or drop off their children.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the

allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Planning Deficiencies in Parks

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The
City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Nicholas Levy MD

La Jolla City Club owner

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From:	Galloway, Tait
To:	PLN University Community Plan Update; PLN_PlanningCEQA
Subject:	FW: Comments to University Community Plan Update Draft EIR
Date:	Friday, April 26, 2024 12:58:32 PM

To Whom It May Concern:

Below are my comments on the City of San Diego's University Community Plan Update Draft EIR (DEIR):

In a short distance on Governor Drive, there is The Marketplace , Spreckels Elementary, Fort Field Little League baseball field,
Standley Recreation Center, Swanson Memorial Pool, Standley Aquatic Center, Jim Carl Field, Standley Middle School,
All Saints Lutheran Church, Chabad Center of University City, University Square,
Chase Bank, University Community Library, Curie Elementary. University City High School is just off Governor.

All these facilities attract groups and families who drive in their cars. All lanes of Governor are frequently full.
People come from all over San Diego for some of the sports events.
It is not reasonable to expect large groups of people to ride bicycles.
There aren't enough buses to replace the cars.
There are many older people in the community who depend on cars to go shopping. They couldn't ride bicycles if they wanted to.

Please keep Governor Drive as it is.

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational

facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,

Earl Kline
5873 Scripps ST
San Diego
CA
92122

From:	Earl Kline
To:	Gloria, Todd
Cc:	CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; UC PEEPS
Subject:	[EXTERNAL] Comments to University Community Plan Update Draft EIR
Date:	Friday, April 26, 2024 12:42:44 PM

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To Whom It May Concern:

Below are my comments on the City of San Diego's University Community Plan Update Draft EIR (DEIR):

In a short distance on Governor Drive, there is The Marketplace , Spreckels Elementary, Fort Field Little League baseball field,
Standley Recreation Center, Swanson Memorial Pool, Standley Aquatic Center, Jim Carl Field, Standley Middle School,
All Saints Lutheran Church, Chabad Center of University City, University Square,
Chase Bank, University Community Library, Curie Elementary. University City High School is just off Governor.

All these facilities attract groups and families who drive in their cars. All lanes of Governor are frequently full.
People come from all over San Diego for some of the sports events.
It is not reasonable to expect large groups of people to ride bicycles.
There aren't enough buses to replace the cars.
There are many older people in the community who depend on cars to go shopping. They couldn't ride bicycles if they wanted to.

Please keep Governor Drive as it is.

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,

Earl Kline
5873 Scripps ST
San Diego
CA
92122

From:	Frederick Gorris
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments on revised UCPlan updte
Date:	Friday, April 26, 2024 12:30:25 PM

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To All those concerned:

The below comments factor in the following:
1. The city of San Diego has experienced a NET EXODUS of people for the first time in decades.
2. I am aware of NO data that shows a decline of Californians giving up their cars. Moving to electric at a slower pace than government desires but NO car relinquishment.
3. The last two City of San Diego budgets reflect continued UNFUNDED LIABILITIES with NO serious effort to reduce same while roads and infrastructure continue to decay.
4. Taxpayers are being asked to pay for services that have already been paid for in previous and ongoing tax bills.
5. Aware of NO studies indicating bikers will number anywhere near the number of drivers
6. Aware of NO data to reduce and support housing of homeless beyond 1 year much less longer. UCC plan fails to address ANY solution.
7. Unlikely ANY of my mature neighbors will use the public transportation to go to medical or grocery shopping. Cold food will melt or spoil before they would get home and their health conditions likely preclude riding a bike up and down the hills to get home. Perhaps a study to confirm would be wise if 10,000 people turn 65 every day for the next two decades and longevity is increasing for that population,.

Below are my comments on the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan.

Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when multiple events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive. Study should be conducted on number of bikers vs vehicles and how bike lanes will be funded.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and

baseball. The plan discusses ways that will be sought to create “more places to walk, bike, play and interact with each other," but it doesn’t provide sound solutions to accommodate sports nor come close to improving UC’s current park deficit and relatively low ranking on the ParkScore Index.

VII. The City’s Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City’s argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC’s demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego’s public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is NO analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It’s imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC’s Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development. Scripts fire lessons do not need to be repeated.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Frederick D. Gorris
UC resident

From:	K Graham
To:	CouncilMember Kent Lee; Causman, Nathen; Gloria, Todd; PLN_PlanningCEQA; Lukes, Suchitra; tomlins@sandiego.gov
Cc:	K Graham
Subject:	[EXTERNAL] Objections to the City"s recent Environmental Impact Report
Date:	Friday, April 26, 2024 12:28:05 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Kent Lee, Mayor Todd Gloria, Nathen Causman, Suchitra Lukes & Coby Tomlins,

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

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a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

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schools let out and parents are attempting to pick up or drop off their children.

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The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

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City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Kristin Graham
Cambridge Terrace

From: Paul Savage
To: Lukes, Suchitra
Subject: [EXTERNAL] San Diego Density Increase Plan
Date: Friday, April 26, 2024 12:26:33 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

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Paul Savage - Cambridge Terrace HOA

From:	Don Steele
To:	PLN_PlanningCEQA
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to University Community Plan Update Draft EIR
Date:	Friday, April 26, 2024 11:58:11 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,

Donald E Steele
3436 Millikin Ave.
San Diego, CA 92122

From: Galloway, Tait
To: PLN University Community Plan Update
Subject: FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR
Date: Friday, April 26, 2024 11:10:43 AM

From: Scott Preece <scottlpreece@gmail.com>
Sent: Friday, April 26, 2024 10:04 AM
To: CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com; PLN_PlanningCEQA <planningceqa@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>
Subject: [EXTERNAL] Comments to University Community Plan Update Draft EIR

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Sincerely,
Scott Preece
University City Resident

From:	Celine Bonnefous
To:	Causman, Nathen
Subject:	[EXTERNAL] Concerns with the Environmental Impact Report
Date:	Friday, April 26, 2024 10:46:07 AM

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Dear Nathen,

As a long time University City resident (more than 25 years) I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

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Celine Bonnefous from Cambridge Terrace

From: huixian Tang
To: CouncilMember Kent Lee; Gloria, Todd
Cc: tomlins@sandiego.gov; ncausman@sandiego.gov; Lukes, Suchitra; PLN_PlanningCEQA
Subject: [EXTERNAL] Housing Action Plan
Date: Friday, April 26, 2024 10:32:11 AM

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Dear Mr. Lee

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Huixian Tang

Cambridge Terrance Owner's Association

From: Alan Lutze
To: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com; PLN University Community Plan Update
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Friday, April 26, 2024 10:27:40 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:
Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using

Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest

any new fire or police stations for our area. The City spent $30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.
Sincerely,

Alan Lutze
6421 Dennison St
San Diego, CA. 92122

From: Scott Preece
To: CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com; PLN University Community Plan Update; Gloria, Todd
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Friday, April 26, 2024 10:02:13 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a

highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

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VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the

transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

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Sincerely,

Scott Preece
University City Resident

From:	Delilah Rivera
To:	PLN_PlanningCEQA
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to University Community Plan Update Draft EIR
Date:	Friday, April 26, 2024 8:26:29 AM

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To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,

Delilah Rivera
5313 Bothe Avenue
San Diego, CA 92122

From: Kathleen Strauss
To: Causman, Nathen
Subject: [EXTERNAL] Objections to University City"s recent Environmental Impact Report
Date: Friday, April 26, 2024 7:04:22 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Mr. Causman,

As a University City homeowner, I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without
a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project

will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Planning Deficiencies in Parks

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Sincerely,

Kathleen L. Strauss, PhD

8124 Via Kino #4; San Diego, CA 92122

858.472.3602

From:	Help Save UC
To:	PLN_PlanningCEQA
Cc:	Gloria, Todd; CouncilMember Joe LaCava; CouncilMember Kent Lee; Chris Nielsen; Andrew Wiese; Lukes, Suchitra
Subject:	[EXTERNAL] Comments on the Draft EIR for Blueprint SD, Hillcrest, and University
Date:	Thursday, April 25, 2024 10:55:54 PM
Attachments:	2024-04-25 HelpSaveUC Comments on DPEIR.pdf

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To Whom It May Concern,

Please find attached our comments on the Draft Program Environmental Impact Report for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update – Document issued March 14, 2024

Regards,

Help Save UC

From: Nancy Beck
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; University City Peeps
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Thursday, April 25, 2024 7:16:10 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

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Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

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III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using

Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

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San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

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communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

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Sincerely,

Nancy Beck
3695 Syracuse Ct
San Diego CA 92122

I APPRECIATE ALL REFERRALS!
Email: nancybeckrealestate@gmail.com | Call me at 858-945-5478 | NancyBeckRealtor.com |
app.realtyonegroup.com/Nancy.Beck

From: Jemma @ University City Community Association
To: Lukes, Suchitra
Subject: [EXTERNAL] UCCA President's Message for April 2024 - It"s about the CPU
Date: Thursday, April 25, 2024 5:54:22 PM

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Hello University City, April has been jam packed with meetings…

Yes, yes…I know the month is almost over, but I did want to wait until we finished a few key meetings.

The first weekend of April kicked off with an excellent "What You Need to Know" presentation by UCCA Secretary and UCPG Liaison Katie Rodolico about the University Community Plan Update released on March 14. Katie provided a well-researched and detailed discussion about the current plan proposal and what was and was not revised form the previous proposal. Watch the April 6 meeting here: https://www.universitycitynews.org/UCCA/SatApr6WhatYouNeed

Next the University Community Planning Group (UCPG) had a hybrid meeting on April 9 with the key presentation being from the Planning Group. You can view that meeting here: https://www.universitycitynews.org/UCCA/Apr9UCPG

Then there was another meeting, held via Zoom, from the Community Plan Update Subcommittee (CPUS), to yes, also talk about the current plan proposal. That meeting can be seen at: https://www.universitycitynews.org/UCCA/CPUSApr2024

And this past Monday, April 22, UCCA held our One & One discussion with Kent Lee. While we focused on a number of issues of concern to our neighborhood, such as: library expansion and upkeep funding; public safety, including funding of our police and fire resources; and Costa Verde and Pure Water construction; you betcha we also talked about…the University Community Plan Update. We had a standing room only crowd, and it was satisfying to see so many people from the community come out and listen to what Councilmember Lee views are on these issues, and in return for him to listen to the concerns of the residents. He also heard about concerns on topics that may not necessarily be on the forefront of our minds, such as upkeep of the North University City dog parks and the effects of Short-Term Vacation Rentals. If you were unable to join us, you can see the recording at: https://www.universitycitynews.org/UCCA/CMKentLeeApr22

I bring up all these meetings where the current plan update was discussed, because the deadline to submit comments is fast approaching – **Monday, April 29, 2024**!!! Yes – this Monday.

To be heard, please make sure to make specific and detailed comments. Refer to page numbers in the Plan Update and/or EIR (Environmental Impact Report) whenever you can. Do not ask questions. They are past that stage. I know they are long documents, and quite frankly, I have not read the entire documents. But go to the sections that are of issue to you the most, and comment on about those pages. And don't forget, if there is something about about the plan that you like, you can make positive comments too.

- Where to find the policy document: https://www.planuniversity.org/
- How to comment on the Draft Plan Update document: **email to planuniversity@sandiego.gov before 4/29/2024**
- Where to find the Environmental Impact Report (EIR): https://www.sandiego.gov/ceqa/draft
- How to comment on the EIR: **email to planningceqa@sandiego.gov before 4/29/2024**

If you haven't become a paid member of UCCA for 2024, please do so and help us support bringing the issues to the community. Send in a check or go to: www.universitycitynews.org/join-ucca-today/.

Save the date for our next General UCCA Meeting on May 8, 5:30pm at the library on Governor Drive to hear about local issues and share your voice. I feel privileged to serve such a passionate community, such as University City. You are all what makes it so special to fight for.

Jemma Samala UCCA, President – ***Thinking Locally, Acting Neighborly***

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From:	mawf41@gmail.com
To:	CouncilMember Kent Lee; Gloria, Todd; PLN_PlanningCEQA; ncausman@sandiego.cov; tomlins@sandiego.gov; Lukes, Suchitra
Subject:	[EXTERNAL] University City Density Increase Plans Objection
Date:	Thursday, April 25, 2024 5:29:07 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear San Diego County Residents Representatives,

As a long-standing University City resident, I am contacting you to express my objections regarding several areas of concern from the City's recent Environmental Impact Report, some of which were already rejected by UC residents when the 'Housing Action Plan' which was part of State Bill 10 that failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day. Also, there are already several high-rise residential projects that have been built in the small radius of UTC space over the last 10-20 years. It has increased the density tremendously while taking away needed infrastructure. I used to be able to walk to the grocery store. Now, I have to get in my car and fight traffic to get to the grocery store while also dealing with a bunch of college students, We do not want or need more high rise residential in this area because UCSD wants more housing for their students. Millions were spent on a trolley system to allow people to live in different parts of the county and get to work via mass transportation or vice versa. Let's put

that project to work in other areas of the county for this underutilized resource. As an alternative, other areas closer to Hwy 52 that have several older apartment and condos should be redeveloped before anything else is added or developed in UTC.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned, sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas. This is NOT acceptable. We, **the people**, have already voted this down!

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Planning Deficiencies in Parks

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans.

The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas. This is **NOT** acceptable!

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Marcia Fisher

Cambridge Terrace HOA

From: Galloway, Tait
To: PLN University Community Plan Update; PLN_PlanningCEQA
Subject: FW: [EXTERNAL] University Community plan
Date: Thursday, April 25, 2024 5:16:20 PM

From: Becky Suedkamp <becky.suedkamp@gmail.com>
Sent: Thursday, April 25, 2024 4:42 PM
To: Gloria, Todd <MayorToddGloria@sandiego.gov>
Cc: CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>
Subject: [EXTERNAL] University Community plan

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

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X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

As residents of University City we fully support the revisions listed above

Sincerely,

Becky and Ed Suedkamp

From: Galloway, Tait
To: PLN University Community Plan Update; PLN_PlanningCEQA
Subject: FW: [EXTERNAL] University Community Plan Update Draft EIR
Date: Thursday, April 25, 2024 5:12:43 PM

-----Original Message-----
From: Mike Devens <mdevens@san.rr.com>
Sent: Thursday, April 25, 2024 3:40 PM
To: Galloway, Tait <TGalloway@sandiego.gov>
Subject: [EXTERNAL] University Community Plan Update Draft EIR

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments. _____

Dear Mr. Galloway,

Below are my comments (as a 47-year resident of UC0 to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA).

According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally, it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,

Mike Devens
2715 Soderblom Ave.
San Diego, CA 92122
858-457-4635

From:	Becky Suedkamp
To:	Gloria, Todd
Cc:	CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava
Subject:	[EXTERNAL] University Community plan
Date:	Thursday, April 25, 2024 4:42:18 PM

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As residents of University City we fully support the revisions listed above

Sincerely,

Becky and Ed Suedkamp

From: John Perna
To: PLN University Community Plan Update
Subject: [EXTERNAL] Changes to University City
Date: Thursday, April 25, 2024 3:21:00 PM

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Sincerely,

Rosemary A. Perna
5865 Dirac St.
San Diego, CA 92122

From: Mike Devens
To: Lukes, Suchitra
Subject: [EXTERNAL] University CPU
Date: Thursday, April 25, 2024 3:09:43 PM

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_____

To whom it may concern,

Below are my comments (As a 47 year resident of UC) to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

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Sincerely,
Mike Devens
2715 Soderblom Ave.
San Diego, CA 92122
858-457-4635

From: John Perna
To: PLN University Community Plan Update
Cc: CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com; Gloria, Todd
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Thursday, April 25, 2024 2:40:31 PM

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John J. Perna UC Resident since 1976
5865 Dirac St.
San Diego, CA 92122

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To: PLN University Community Plan Update
Cc: CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com; Gloria, Todd
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5865 Dirac St.
San Diego, CA 92122

From:	University City Peeps
To:	PLN University Community Plan Update
Subject:	[EXTERNAL] Fwd: UC PEEPS" Comments on Revised University Community Plan Update
Date:	Thursday, April 25, 2024 2:20:30 PM

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---------- Forwarded message ---------
From: **University City Peeps** <universitycitypeeps@gmail.com>
Date: Wed, Apr 24, 2024 at 2:47 PM
Subject: UC PEEPS' Comments on Revised University Community Plan Update
To: <planuniversity@sandiego.gov>

NOTE: WE KEEP GETTING A MESSAGE FROM YOUR SERVER THAT THIS MESSAGE BOUNCED.

To Whom It May Concern:

On behalf of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, I'm submitting our combined comments on the City of San Diego's revised University Community Plan Update (University CPU):

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Bonnie Kutch
Resident of University City and
Founding Member of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, an Association of 500-plus UC Residents & Property Taxpayers

Bonnie Kutch | University City PEEPS | 619.299.1010

--

Bonnie Kutch | University City PEEPS | 619.299.1010

From:	Zhou, Xianjin
To:	CouncilMember Kent Lee
Cc:	Gloria, Todd; PLN_PlanningCEQA; ncausman@sandiego.cov; Lukes, Suchitra; tomlins@sandiego.gov
Subject:	[EXTERNAL] Housing Action Plan
Date:	Thursday, April 25, 2024 1:18:56 PM

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Dear Mr. Lee

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

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not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

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Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Xianjin Zhou
Cambridge Terrance Owner's Association

From: Christina Laurin
To: Causman, Nathen
Subject: [EXTERNAL] Fwd:
Date: Thursday, April 25, 2024 12:56:32 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

---------- Forwarded message ---------
From: **Christina Laurin** <claurin619@gmail.com>
Date: Thu, Apr 25, 2024 at 12:53 PM
Subject:
To: <kentlee@sandiego.gov>, <mayortoddgloria@sandiego.gov>, <planningceqa@sandiego.gov>, <ncausman@sandiego.cov>, <slukes@sandiego.gov>, <tomlins@sandiego.gov>

Dear representatives

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

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Christina Laurin
8285 Avenida Navidad, Unit 1
San Diego, C 92122
Cambridge Terrace Resident

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Christina Laurin
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Graphic Art/Web Design
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http://www.claurin.com

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http://www.claurin.com

From:	Sean A. Kilpatrick
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Thursday, April 25, 2024 12:56:21 PM

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To Whom It May Concern;

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a

highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the

transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,
Sean A. Kilpatrick
3333 Mercer Lane
San Diego, CA 92122

From: Christina Laurin
To: CouncilMember Kent Lee; Gloria, Todd; PLN_PlanningCEQA; ncausman@sandiego.cov; Lukes, Suchitra; tomlins@sandiego.gov
Subject: [EXTERNAL]
Date: Thursday, April 25, 2024 12:54:08 PM

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Dear representatives

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The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Christina Laurin
8285 Avenida Navidad, Unit 1
San Diego, C 92122
Cambridge Terrace Resident

--

Christina Laurin
C. Laurin Arts, LLC
Graphic Art/Web Design
619.277.3783
http://www.claurin.com

From: James
To: CouncilMember Kent Lee
Subject: [EXTERNAL] UC Environmental Impact Report Concerns
Date: Thursday, April 25, 2024 12:09:04 PM

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Hello:

As a University City resident I am contacting you to express my strong objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023.

The current below initiatives ignore the need for a workable and supportive infrastructure. They fail to provide even somewhat affordable housing, disregard existing residents' input, and intentionally erode single-family neighborhoods.

Here are some key concerns:

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Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

James Wrubel

Cambridge Terrace HOA

University City

From: Jodi Lambert
To: CouncilMember Kent Lee; Gloria, Todd; Causman, Nathen; Lukes, Suchitra; tomlins@sandiego.gov
Subject: [EXTERNAL] Objection to San Diego's Density Increase Plan
Date: Thursday, April 25, 2024 12:05:42 PM

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Dear Sir/Madam:

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

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Sincerely,

Jodi E. Lambert
Cambridge Terrace HOA

From: Celine Bonnefous
To: Lukes, Suchitra
Subject: [EXTERNAL] Concerns with the Environmental Impact Report
Date: Thursday, April 25, 2024 11:59:39 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Dear Suchitra,

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

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In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents’ input, and intentionally erodes single-family neighborhoods.

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Celine Bonnefous from Cambridge Terrace

From:	Kay
To:	CouncilMember Kent Lee; Gloria, Todd; PLN_PlanningCEQA; ncausman@sandiego.cov; Lukes, Suchitra; tomlins@sandiego.gov
Subject:	[EXTERNAL] City Planning: Please Consider How It Will Impact Us!!
Date:	Thursday, April 25, 2024 11:49:21 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Good afternoon,

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the
schools let out and parents are attempting to pick up or drop off their children.

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

Planning Deficiencies in Parks

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

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Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

Best regards,

The Noncovich Family

From:	Eileen McKoy
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Thursday, April 25, 2024 10:58:59 AM

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BELOW IS OBVIOUSLY A FORM LETTER BUT WE FIRMLY BELIEVE IT EXPRESSES THE VIEWS OF THE MAJORITY OF UNIVERSITY CITY RESIDENTS, WHO, NO DOUBT, WILL MAKE THEIR FEELINGS KNOWN AT THE BALLOT BOX.

LIVING IN UNIVERSITY CITY IS ALREADY HAZARDOUS IN THE EVENT OF AN EMERGENCY. ONE DOES NOT HAVE TO DO A STUDY TO SEE THAT WHEN PEOPLE ARE ON THE MOVE GENESEE IS A BOTTLENECK. THE IDEA OF MAKING WEST GOVERNOR TWO LANE IS MADNESS WITH TWO SCHOOLS ON THAT ROUTE AND TWO OTHERS NEARBY WITH FAMILIES MAKING DROP-OFFS AND PICK-UPS. WHAT PARENT IS GOING TO SEND THEIR CHILDREN TO SCHOOL ON BIKES WITH THE CAR CHAOS THAT WILL ENSUE. AND IT WOULD NOT TAKE A STUDY, EITHER, TO DISCOVER THAT BIKES ARE RARELY SEEN IN UNIVERSITY CITY! FURTHERMORE, THE TROLLEY IS USELESS FOR RESIDENTS - FOR MUCH OF UNIVERSITY CITY THERE IS NO PUBLIC TRANSPORT TO CONNECT TO THE TROLLEY. THERE IS NO BUS ALONG EAST GOVERNOR. IN THOSE COUNTRIES WHERE PUBLIC TRANSPORT WORKS, BUSES MEANDER THROUGH LOCAL COMMUNITIE AND PEOPLE CAN WALK TO THE BUS STOP.

To Whom It May Concern:

Below are our comments to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action

Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk,

bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire staton to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the

City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

(Your name/residence)

DEIR COMMENTS

To: planningceqa@sandiego.gov

Cc: mayortoddgloria@sandiego.gov, kentlee@sandiego.gov, tgalloway@sandiego.gov, ctomlins@sandiego.gov, SLukes@sandiego.gov, NCausman@sandiego.gov, joelacava@sandiego.gov, universitycitypeeps@gmail.com

Subject: Comments to University Community Plan Update Draft EIR

(Body of Email)

To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-

year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,
Eileen and Anthony McKoy
4307 Rous Street
San Diego, CA 92122

From:	Andrea Gray
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] My comments on the Revised University Community Plan Update
Date:	Thursday, April 25, 2024 10:37:17 AM

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It seems to me the revised plan is for excessive growth of population with no provision for services for safety and quality of life.

Please don't do this to your long term residents.

Andrea Wild
Resident of UC

From: Bill Breher
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Thursday, April 25, 2024 7:47:59 AM

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budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

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VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

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Sincerely,

William and Joan Breher
3295 Welmer Place

San Diego, CA 92122

From: Joseph Risse
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Thursday, April 25, 2024 6:59:43 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

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Sincerely,

Joseph Risse
3580 Stetson Avenue

SD, CA 92122

From:	JENNIFER HAKEEM
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Thursday, April 25, 2024 6:47:57 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

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II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS'

budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

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Sincerely,

Jennifer Hakeem
6014 Tulane Street

San Diego, Ca 92122

Sent from my iPhone

From:	Brendan Shannon
To:	PLN University Community Plan Update; Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Thursday, April 25, 2024 6:05:28 AM

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Good morning,

I am very concerned with several elements of the City of San Diego's revised University Community Plan Update (University CPU). Here are my comments:

1. Housing Density: The proposed plan to add 30,480 housing units, more than doubling University City's population, is unsustainable. It would strain infrastructure and increase carbon emissions, contrary to the City's Climate Action Plan. A reduction to 15,000 additional units is necessary.

2. Governor Drive Traffic: Changes to Governor Drive should not proceed without an updated and comprehensive Traffic Analysis, especially given the traffic from local schools and parks.

3. Zoning at Shopping Centers: Proposed zoning changes at the Sprouts and Vons centers should be reduced to mitigate impact on traffic and adjacent residential areas. The maximum height should be limited to 40 feet at Sprouts and 50 feet at Vons with lower housing density.

4. Parking at Shopping Centers: Maintain the current number of commercial parking spaces and require sufficient parking for new residential units.

5. Recreation Facilities: With the population increase, more recreational facilities are needed. The proposal to convert the Scripps Shiley Center is inadequate due to its distance from residential areas.

6. Park Space: The plan lacks adequate provision for usable park spaces for sports and recreational activities, which is critical given the existing park deficit.

7. Public Transit Realism: Claims that residents will shift from cars to public transit are unsupported. The current transit system is inadequate, especially for families, seniors, and emergency situations.

8. Fire and Safety Infrastructure: The plan must address the need for additional fire and police stations to meet safety standards and response times, particularly given the projected population growth.

9. Wildfire Risks: The significant wildfire risks in University City necessitate detailed planning and infrastructure development before increasing density.

10. Housing Affordability: The CPU should ensure that a significant portion of new housing units are affordable to low- and middle-income families, detailing specific conditions

for developers.

11. Funding for Infrastructure: Detailed funding mechanisms are required to support the infrastructure, public facilities, and enhancements envisioned in the plan update.

Sincerely,
Brendan Shannon
619-251-9567

From: Carrie Lail Reichert
To: PLN University Community Plan Update
Subject: [EXTERNAL] UC plan
Date: Wednesday, April 24, 2024 8:25:21 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Any community without shopping centers, FOOD SHOPPING, a post office, and a bookstore/ is not a community that supports essential services - such that you don't have to get on a FREEWAY to buy groceries.

Carrie Lail Reichert
UC resident for 26 years.

From:	Paulette92122
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; University City Peeps
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Wednesday, April 24, 2024 7:57:17 PM

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Sincerely,
Gerald and Paulette Williams
6175 Mercer St, 92122

From: Lori Alford
To: PLN University Community Plan Update
Subject: [EXTERNAL] Comments on University City Draft Report
Date: Wednesday, April 24, 2024 7:40:12 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Regarding the La Jolla Colony area greenbelt, I wish to voice opposition to any government proposal to turn the decomposed granite path into a multi use path for e bikes and e scooters. This path is located on private property for which the homeowners pay HOA dues. The quiet DG path is used by local residents for walking only. Toddlers are seen improving their walking skills on this DG path. It feels safe and quiet. The character of the path will be harmed if the city opens this path for e bikes/scooters. It will invite collisions and discomfort for children and elderly in the neighborhood. It will be unpleasant to stroll along the path while fast e bikes/scooters go whizzing by. This is totally unnecessary and inappropriate.

There is a cycle path around this green belt on Palmilla Dr. (and Charmant) both of which encircle this small green park. These circular streets both connect to La Jolla Colony drive on the south end and Nobel on the north. The cycle path is well protected from vehicle traffic by a buffer. This is a fine option used by many. There is no need to ruin the quiet and character of this La Jolla Colony walking path located in the park.

I also wish to voice my opposition to the placement of a micro mobility hub at the south end of this La Jolla Colony greenbelt park, where there is a 3 way stop connecting La Jolla Colony Drive, Palmilla, and Charmant Drives. As it is now, a lovely verge of beautiful bushes and flowers greet all at this intersection. A micromobility hub will ruin the natural beauty of this area and create an ugly eyesore. With a micromobility hub, we will lose the oxygen generated by the plant life. Furthermore, a micromobility hub will encourage the careless and irresponsible use of batteries to power these e bikes and e scooters. We do not need a plethora of these things in the environment. The material needed for these e bikes and scooters, especially the batteries, have a negative environmental impact.

The replacement of a lovely green area with steel, batteries, and ugly e bikes and e scooters will create negative effects on residents' mental health. We have so few green spaces as it is. The hub will collect trash, refuse, and the material will decay out in the weather. It will be necessary for the city to maintain this area, which in all likelihood will become a worse eyesore with age.

What this La Jolla Colony greenbelt park offers is a beautiful and quiet green respite from urban stresses. It does not need to be changed in any way. Walking is good for the residents' mental and physical health and does not impact the environment in any negative way (unlike e bikes and e scooters).Please do not change the walking path for mixed use, i.e. e bikes/e scooters and please do not tear out the beautiful green space for an ugly and environmentally unfriendly micromobility hub. Plants, flowers, and bushes are the best option for the residents and for the environment.

Sincerely,
Lori A. Ford

From: Don Danner
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Wednesday, April 24, 2024 6:16:33 PM

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Sincerely,

Donald Danner
33-year home owner in University City

5433 Dalen Avenue
San Diego, Ca 92122

From:	Roxieann Danner
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Wednesday, April 24, 2024 6:06:41 PM

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To Whom It May Concern:

Below are my comments to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS'

budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent $30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Roxieann Danner
55-year home owner in University City

5433 Dalen Avenue
San Diego, Ca 92122

From:	Jim
To:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Wednesday, April 24, 2024 5:16:05 PM

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To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. University City is NOT responsible for providing housing for University of California San Diego students! The State of California should construct adequate housing on the UCSD campus. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

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III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high

with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

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VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. I do not want to take public transit because the trolley and buses are crime ridden and germ infested. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

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population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements.

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X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Jim Smith, University city resident

From:	Jan Zverina
To:	PLN_PlanningCEQA
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; University City Peeps
Subject:	[EXTERNAL] Comments to University Community Plan Update -- Draft EIR
Date:	Wednesday, April 24, 2024 4:18:01 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

Below are my comments and objections to several parts of the City of San Diego's University Community Plan Update Draft EIR (DEIR) as several of them are legally deficient:

I. Changes to Governor Drive: Converting Governor Drive from a four-lane Major Arterial to two-lanes may actually fail the legal test because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. **No changes to Governor Drive can be made without a current Traffic Analysis and VMT performed at peak hour traffic times.**

II. Emergency Access/Ingress:
Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as it's proximity to MCAS Miramar, just to name two factors. **The City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.** Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met: The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. **Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.**

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. **The DEIR needs to be revised to include the community's preferred alternative.**

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including

the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. **The DEIR should be separated into three separate EIRs for each proposed plan update.**

VI. The DEIR Should Evaluate the Full Spectrum of Enviromental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. **Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.**

I hope that this time around the City does seriously welcome thoughtful input and inclusion from residents!

Jan & Valerie Zverina
4325 Via Monclova
San Diego CA 92122

From:	Edmund Hintz
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Wednesday, April 24, 2024 3:49:47 PM

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To Whom It May Concern:

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III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as

many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

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VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego’s public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

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--
Regards,

Ed Hintz
ed@hintz.org
6949 Fisk Ave,
San Diego, CA, 92122

From: Earl Kline
To: PLN University Community Plan Update
Cc: Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; UC PEEPS
Subject: [EXTERNAL] Comments to Revised University Community Plan Update
Date: Wednesday, April 24, 2024 3:35:32 PM

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To Whom It May Concern:

The Revised UC Plan Update is bad for current and future residents.

Below are my comments on the City of San Diego's revised University Community Plan Update (University CPU):

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Sincerely,

Earl Kline
5873 Scripps St

San Diego CA 92122

From:	University City Peeps
To:	PLN_PlanningCEQA
Cc:	CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; Gloria, Todd; Andrew Wiese; Chris Nielsen
Subject:	[EXTERNAL] UC PEEPS" Comments on University Community Plan Update Draft EIR
Date:	Wednesday, April 24, 2024 2:58:58 PM
Attachments:	2024 Draft Mobility Technical Report Review - April2024.docx

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

To Whom It May Concern:

On behalf of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, I'm submitting our combined comments on the University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. (See attachment with expert Traffic Analysis relative to Governor Drive.)

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR,

but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

Sincerely,
Bonnie Kutch, Resident of University City
Founding Member of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, an Association of 500-plus University City Residents and Property Taxpayers

Bonnie Kutch | University City PEEPS | 619.299.1010

From:	Cheryl Burian-Baldwin
To:	PLN University Community Plan Update
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; universitycitypeeps@gmail.com
Subject:	[EXTERNAL] Comments to Revised University Community Plan Update
Date:	Wednesday, April 24, 2024 2:56:33 PM

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To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes. The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered. The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage.

The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

IV. Customer Parking Should be Maintained at South UC Shopping Centers. The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers. University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

VI. More Solutions are Needed for Larger, Usable Park Space. The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

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X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,

Cheryl A. Burian-Baldwin
6572 Cascade St.

University City

From: University City Peeps
To: PLN University Community Plan Update
Subject: [EXTERNAL] UC PEEPS" Comments on Revised University Community Plan Update
Date: Wednesday, April 24, 2024 2:48:14 PM

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I. The City Should Reduce the Proposed Housing Density By at Least Half. The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

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Founding Member of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, an Association of 500-plus UC Residents & Property Taxpayers

Bonnie Kutch | University City PEEPS | 619.299.1010

From:	University City Peeps
To:	planunversity@sandiego.gov
Cc:	Gloria, Todd; CouncilMember Kent Lee; Galloway, Tait; Tomlins, Coby; Lukes, Suchitra; Causman, Nathen; CouncilMember Joe LaCava; Andrew Wiese; Chris Nielsen
Subject:	[EXTERNAL] UC PEEPS" Comments on University Community Plan Update
Date:	Wednesday, April 24, 2024 2:41:18 PM

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Bonnie Kutch
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Founding Member of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, an Association of 500-plus UC Residents & Property Taxpayers

Bonnie Kutch | University City PEEPS | 619.299.1010

From: Brian Revelli
To: PLN University Community Plan Update
Subject: [EXTERNAL] RE: Commercial Office Zone in UC Community Plan Update
Date: Monday, April 22, 2024 10:26:16 AM

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_____

Hi I have emailed several times about the Commercial Office Zoning in proposed zoning map for the UC Community Plan Update. I notice Governor Park which is currently zoned IP-2-1 could be rezoned to the pink color which is Commercial Office. What is the actual zoning code for this proposed Commercial Office zoning (pink color)? Thank you!

Brian Revelli
858-663-7702

From: Causman, Nathen
To: PLN University Community Plan Update
Subject: Fw: [EXTERNAL] Comments on UC plan Update Draft
Date: Monday, April 22, 2024 9:21:57 AM

Nathen Causman
Senior Planner
City of San Diego
City Planning Department
T (619) 236-7225

From: William Beck <itsaok@aol.com>
Sent: Friday, April 19, 2024 1:26 PM
To: Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>
Subject: [EXTERNAL] Comments on UC plan Update Draft

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To Whom It May Concern,

Vista La Jolla is a small community of 56 private detached homes, each owning its own land. Established in 1978, it is part of a 'super block' that includes the Westfield University Towne Centre Shopping Mall, the Westfield UTC transit hub, the Vista La Jolla Townhomes, and the Torrey Pine Apartments.

During the first revision of the Community Plan update, Vista La Jolla was slated for a change from residential/commercial to residential low density. However, the current plan proposes a high or medium density designation for our community. The proposed map is in the PEIR on page 3-52 (page 138 of the PDF). The Vista La Jolla neighborhood is shown as Residential Low-4 (15-29 du/acre)

The high-density alternative is shown in figure 8-1, page 8-17, page 780 of the PEIR PDF. The Vista La Jolla neighborhood shows as high density residential (45-75 du/acre)

As the only enclave of single-detached family homes owning its own land in North University City, Vista La Jolla deserves equitable treatment akin to the single-family homes prevalent in South University City.

Despite its urban surroundings, encompassed by high-rise buildings, Westfield UTC, and a few strip malls, Vista La Jolla retains its distinctive character.

Our unique community of 56 single-family homes, complete with its own park accessible to all, should not face reclassification under the new Community Plan to high or medium density.

Respectfully,

William H. Beck

President of the Vista La Jolla & Renaissance La Jolla Board of Directors

From:	frasierf@ix.netcom.com
To:	bkutch@kutchco.com; PLN University Community Plan Update; "Charles Frasier"; "University Plan Update Subcommittee Chairman Andy Weiss"; ""University Plan Update Group Chairman Chris Nielsen"
Subject:	[EXTERNAL] Anti-Semitism in the University City Community Plan (UCP) draft of March 2024
Date:	Monday, April 22, 2024 8:19:10 AM

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Hello,

The University City Community Plan (UCP) draft of March 2024 as revealed in Figure 3 (Planned Land Uses) and the Proposed Zoning Map is anti-Semitic.
Congregation Beth Israel located on Town Center Drive is proposed to be zoned 'Urban Village High - 3 (RMX-3)' while the Christian First Babtist, Catholic,
Universal churches and the Latter-day Saints' church on Governor Drive as well as the Temple next to Interstate 5 are proposed to be zoned 'Institutional'.
The other Jewish place of worship, Chabad Center of U.C. on Governor Drive, is proposed to be zoned 'Community Village Medium - 3'.

When questioned about the religious discrimination of the land use plan at the presentation of the UCP on April 9, 2024, Ms. Suchitra Lukes of the San Diego
Planning Department answered that "Urban Village High - 3' encompassed many uses and the Congregation Beth Israel congregation had the opportunity to
decide what use they wanted for their property.

Why wasn't this same opportunity afforded to the Christian and Later Day Saints places of worship on Governor Drive and next to interstate 5?

The UCP should zone all places of worship equally irrespective of their religious affiliation.

I recommend that the UCP land use plan be modified so that all places of worship are zoned 'Institutional' and that UCP figure 3 and the Proposed Zoning
Map be changed to reflect these modifications.

Sincerely,
Charles Frasier

Virus-free.www.avast.com

From: M Petrie
To: PLN University Community Plan Update
Cc: awiese@sdsu.edu; M Petrie
Subject: [EXTERNAL] critical comments DEIR & re-zoning
Date: Sunday, April 21, 2024 2:41:11 PM

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This comment concerns the parcel of land called La Jolla Colony shopping center in North UC. We live across the street from the shopping center. We strongly believe that a rezoning of this commercial neighborhood (CN) shopping center to CC-38 would lead to irreparable harm and unfavorable consequences to the neighborhood, and we find the DEIR is clearly deficient in addressing concerns.

(1) Rezoning to this level would lead to major traffic, congestion, and parking problems for everyone involved, and this is not addressed. As it is, finding street parking along Regents Road is difficult, particularly during evening hours.

(2) The impact of noise is not even addressed in this DEIR, because the document says they do not know what they are, other than to say the noise impacts will be significant (e.g., pp.50-51, section 4.11). So this part of the EIR is clearly deficient. And once the noise impact is finally resolved, what mitigation will be provided for noise attenuation to the surrounding low density residences ? Some of the residences surrounding the shopping center were built before Title 24 (e.g., RM-1-1 buildings on the east side of Regents Rd). So, once the city evaluates the noise impact, the city would have to do mitigation on these buildings to ameliorate the enhanced noise due to traffic, bus, and much higher density. This is not even discussed, but it obviously is required to complete the EIR. For example, would mitigation include double pane windows and HVAC systems?

(3) Because most of the residences surrounding the shopping center are 2 stories with the lowest multi-family densities, the allowance of 100 foot high buildings in CC-38 is completely out of character with the surrounding residences.

(4) This area of North UC is supposed to have density decreasing from Nobel south to Rose Canyon. The proposed CC-38 is clearly not compatible with

that scenario.

Marlene & Tom Petrie
residents of North UC

From: William Beck
To: PLN University Community Plan Update
Subject: [EXTERNAL] Comment on University Plan update
Date: Friday, April 19, 2024 1:23:22 PM

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To Whom It May Concern,

Vista La Jolla is a small community of 56 private detached homes, each owning its own land. Established in 1978, it is part of a 'super block' that includes the Westfield University Towne Centre Shopping Mall, the Westfield UTC transit hub, the Vista La Jolla Townhomes, and the Torrey Pine Apartments.

During the first revision of the Community Plan update, Vista La Jolla was slated for a change from residential/commercial to residential low density. However, the current plan proposes a high or medium density designation for our community. The proposed map is in the PEIR on page 3-52 (page 138 of the PDF). The Vista La Jolla neighborhood is shown as Residential Low-4 (15-29 du/acre)

The high-density alternative is shown in figure 8-1, page 8-17, page 780 of the PEIR PDF. The Vista La Jolla neighborhood shows as high density residential (45-75 du/acre)

As the only enclave of single-detached family homes owning its own land in North University City, Vista La Jolla deserves equitable treatment akin to the single-family homes prevalent in South University City.

Despite its urban surroundings, encompassed by high-rise buildings, Westfield UTC, and a few strip malls, Vista La Jolla retains its distinctive character.

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Respectfully,

William H. Beck

President of the Vista La Jolla & Renaissance La Jolla Board of Directors

From:	Jeff Dosick
To:	PLN University Community Plan Update
Cc:	Chris Nielsen; Andrew Wiese
Subject:	[EXTERNAL] Torreyana Rd, Science Park Rd, and Callan Rd
Date:	Friday, April 19, 2024 12:15:15 PM
Attachments:	image.png image.png

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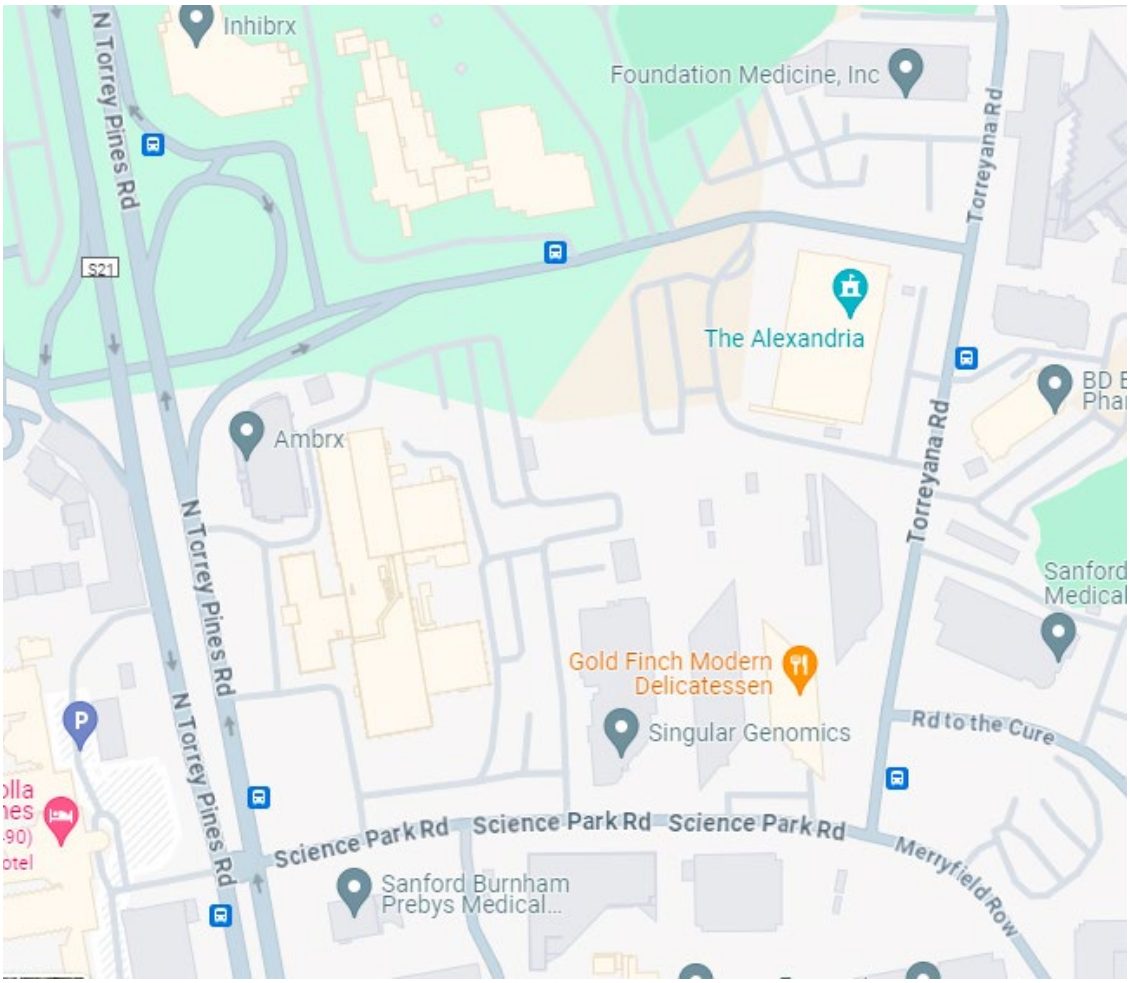
These 3 streets currently are not included in the Planned Classification Designation
They need to be.
It has been discussed at the UCPG meetings with City staff and was suppose to be included as Class III Bicycle Boulevards


Inhibrx
Foundation Medicine, Inc
N Torrey Pines Rd
Torreyana Rd
S21
The Alexandria
Ambrx
Gold Finch Modern Delicatessen
Singular Genomics
Science Park Rd
Science Park Rd
Science Park Rd
Merryfield Row
Sanford Burnham Prebys Medical...

From: Jeff Dosick
To: PLN University Community Plan Update
Cc: Chris Nielsen; Andrew Wiese
Subject: [EXTERNAL] Eastgate Mall Planned Bicycle Network Table 4 Incorrect
Date: Friday, April 19, 2024 11:26:42 AM
Attachments: image.png
image.png

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Eastgate Mall Rd. was built with Class II bike lanes. Over the years this East/West connected bike corridor has been
chopped up.

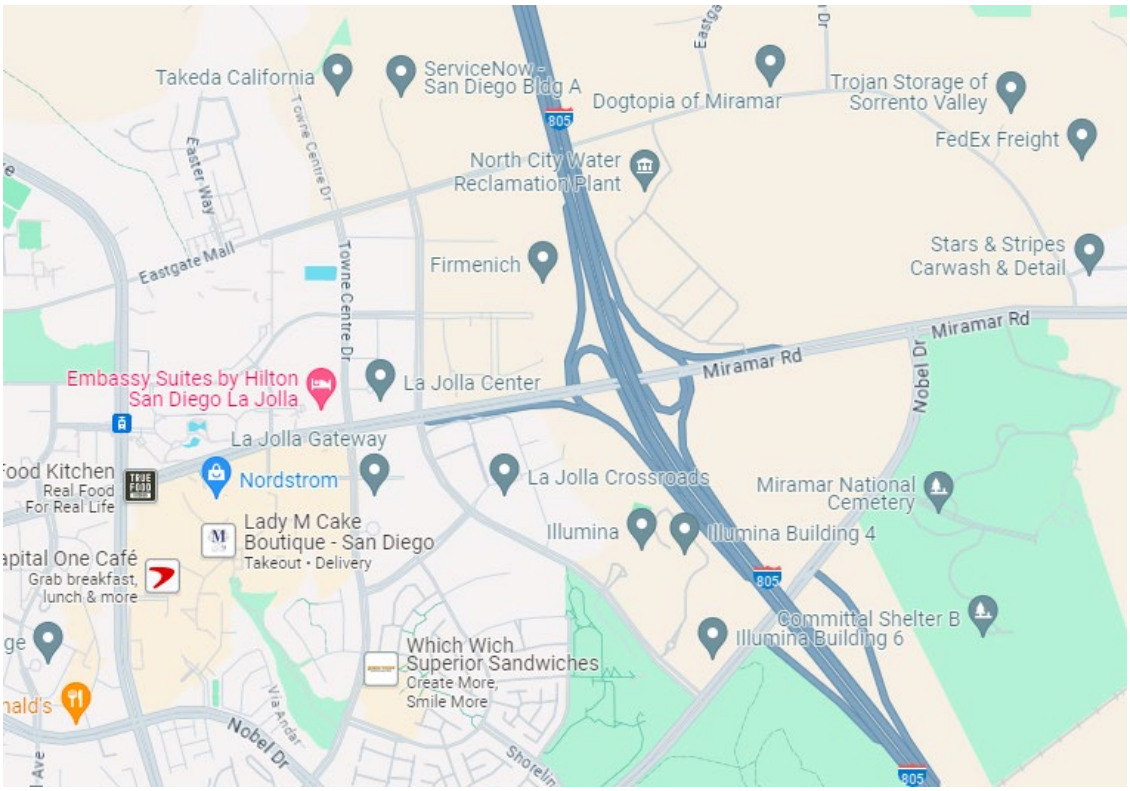
Table 4: Planned Bicycle Classifications Modifications

Roadway	Segment	Existing	Planned Classification Designation
Arriba St	Palmilla to Regents Rd	Class II	Class IV (One Way)
Campus Point Dr	UCSD Center for Advanced Laboratory to Genesee Ave	N/A	Class IV (Two Way)
Costa Verde Blvd	La Jolla Village Dr to Nobel Dr	N/A	Class II (Buffered)
Eastgate Mall	Regents Rd to Genesee Ave	N/A	Class II (WB) / Class IV (One-Way)
Eastgate Mall	Genesee to Judicial Dr	Class II	Class IV (One Way)
Eastgate Mall	Judicial to I-805 SB Ramps	Class II	Class II (WB) / Class IV (Two-Way)
Eastgate Mall	I-805 SB Ramps to Olson Dr	Class II	Class IV (Two Way)
Eastgate Mall	Olson Dr to Miramar Rd	N/A	Class IV (Two Way)

1. Genesee to Judicial Dr.
There are NO Class II connected existing bike lanes. There used to be!
What exists here now is a dangerous, unsafe roadway both ways.
Especially in peak rush hour vehicle traffic wanting to turn right onto Genesee to get onto the freeway.
The bike lane on the north side coming up to Genesee needs to allow a safe, stress free route heading WB and turning right.

2. Judicial Dr. to I805 SB Ramps
Eastgate Mall Rd has no 805 ramps! That is what makes it so essential as a viable, safer, route.
The 2 other East/West corridors are La Jolla Village Dr. and Nobel Dr. both have 805 ramps

3. I-805 SB Ramps to Olsen DR
There no longer are existing Class II bike lanes here on both sides.


Takeda California
ServiceNow - San Diego Bldg A
Dogtopia of Miramar
Trojan Storage of Sorrento Valley
FedEx Freight
North City Water Reclamation Plant
Eastgate Mall
Towne Centre Dr
Firmenich
Stars & Stripes Carwash & Detail
Miramar Rd
Nobel Dr
Embassy Suites by Hilton San Diego La Jolla
La Jolla Center
La Jolla Gateway
Nordstrom
La Jolla Crossroads
Miramar National Cemetery
Illumina
Illumina Building 4
Lady M Cake Boutique - San Diego
Takeout • Delivery
Capital One Café
Grab breakfast, lunch & more
Committal Shelter B
Illumina Building 6
Which Wich Superior Sandwiches
Create More, Smile More
Via Andar
805

From:	Donald mcGrath
To:	PLN University Community Plan Update
Subject:	[EXTERNAL] UC plan
Date:	Friday, April 19, 2024 11:26:36 AM

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_____

Thanks . Please scrub turning Governor into bike lanes. I have lived on Bloch st in the West of UC for over 50 years and in the event of Brush fire fire engines will not be able to get to my home. Goernor is already overcrowded at “School drop off and pick up hours” .Finally there is no egress for bikers on Governor. Insisting on narrowing Governor May result in injury or death to residents of South And west UC. Don McGrath, 5374 Bloch street. 6199907788

Sent from my iPhone

From:	frasierf@ix.netcom.com
To:	bkutch@kutchco.com; PLN University Community Plan Update; "Charles Frasier"; "University Plan Update Subcommittee Chairman Andy Weiss"; ""University Plan Update Group Chairman Chris Nielsen"
Subject:	[EXTERNAL] FW: UC Plan Update Draft Mobility Report Technical Report presentation by Charles Frasier at CPU Update Subcommittee meet 4/16/2024
Date:	Wednesday, April 17, 2024 5:39:04 PM
Attachments:	2024 Draft Mobility Technical Report Review - April2024.docx

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Oopps, the report is attached to this email. Sorry

From: Charles Frasier <outlook_366ADF792ED1A0F5@outlook.com> **On Behalf Of** Charles Frasier
Sent: Wednesday, April 17, 2024 5:31 PM
To: bkutch@kutchco.com; planuniversity@sandiego.gov; Charles Frasier <FrasierF@ix.netcom.com>; 'University Plan Update Subcommittee Chairman Andy Weiss' <awiese@sdsu.edu> <awiese@sdsu.edu>; 'University Plan Update Group Chairman Chris Nielsen <cn@adsc-xray.com> <cn@adsc-xray.com>
Subject: UC Plan Update Draft Mobility Report Technical Report presentation by Charles Frasier at CPU Update Subcommittee meet 4/16/2024

Hello,

At the CPU Subcommittee meeting I made a presentation saying that **The conclusion to be drawn from the Mobility Analysis is that converting Governor Drive from a 4-lane Major Arterial to a 2-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report.**

I also requested that the CPU Sub-committee recommend retaining Governor Drive as a 4 lane Major Arterial roadway.

Attached, please find the report upon which my presentation was based. It gives the citations in the Draft Mobility Report Technical Report that support my conclusion.

Sincerely,
Charlie Frasier

Sent from Mail for Windows 10

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From:	Charles Frasier
To:	bkutch@kutchco.com; PLN University Community Plan Update; Charles Frasier; "University Plan Update Subcommittee Chairman Andy Weiss" <awiese@sdsu.edu> ; "University Plan Update Group Chairman Chris Nielsen <cn@adsc-xray.com>
Subject:	[EXTERNAL] UC Plan Update Draft Mobility Report Technical Report presentation by Charles Frasier at CPU Update Subcommittee meet 4/16/2024
Date:	Wednesday, April 17, 2024 5:30:51 PM

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Hello,

At the CPU Subcommittee meeting I made a presentation saying that **The conclusion to be drawn from the Mobility Analysis is that converting Governor Drive from a 4-lane Major Arterial to a 2-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report.**

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Attached, please find the report upon which my presentation was based. It gives the citations in the Draft Mobility Report Technical Report that support my conclusion.

Sincerely,
Charlie Frasier

Sent from Mail for Windows 10

From: cbeacom@san.rr.com
To: cn@adsc-xray.com; Lukes, Suchitra
Subject: [EXTERNAL] Question about University Plan - need to know before I formally comment
Date: Wednesday, April 17, 2024 3:47:36 PM

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Hi Chris or Suchi.

Quick question, I hope. I am a homeowner in University City and am "late to the party" regarding the draft plan for our community. I have attended a few meetings now; one in person and two on zoom and know where I need to formally comment on the plan and will do so. I would have commented at the Zoom meeting of the UCPG subcommittee last night, but I don't yet have the information I need to do so. I'm trying to find out some information about Governor Drive and can't find it in the draft plan and haven't heard it in the meetings, most likely because I'm 3 years behind the times and everyone else knows about it.

So . . . With the proposal to change Governor Drive from 4 lanes to 2 lanes, would there still be street parking? Would there be one lane then a bike lane then street parking? I may be the only one in University City who loves the concept of Governor being two lanes to create disincentives for commuters to use it, and slow down traffic and keep the property values up along Governor Drive (unlike Clairemont Drive when it became a major thoroughfare). Maybe it would even create an incentive for kids who live nearby to walk home from school if they can do it safely (not all can). I will comment to the City accordingly but need to know about the parking situation first. I keep thinking of La Jolla Blvd in Bird Rock and how lovely it is since it was reduced, and traffic circles were put in. And even Moraga Blvd's traffic circles; while less lovely are better than stop signs.

While I agree with the majority of the community on the density, I may feel differently than most about Governor Drive, pending the parking issue.

Please advise and thank you.

Crunchy Beacom
858.337.5247

(Formal name: Luann Beacom MSN, MPH, FNP, CNS, C-EFM)

p.s. Suchi – As I watched your team in these meetings, I kept thinking about my 34 y.o. son who received his Master of City Planning from SDSU. He is a stormwater specialist now but if he had ended up as a planner, I'm not sure he could be as graceful as you all have been. Kudos to your team even if I don't agree with the plan!

From: Lynn Shields
To: PLN University Community Plan Update
Subject: [EXTERNAL] Fwd: University City changes
Date: Wednesday, April 17, 2024 10:11:24 AM

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Please listen to the community of University City and represent us in the following:

Do not change Governor Drive to be one lane in each direction. Find another way to add bike lanes. There are three schools along Governor Drive and a very busy Recreation Center and competitive aquatic center. If you were to visit Governor Drive in real time during pick up and drop offs, you would see for yourself that reducing to one lane in each direction is a terrible idea. In addition, it threatens the well being, safety and ability for emergency services to reach our community. Governor Drive must remain 4 lanes. Vote accordingly.

Do not destroy our neighborhood with the threat of high rise buildings at our shopping centers. The majority of the community and the property owners that live adjacent to these centers have serious concerns about how this will negatively affect their quality of life, homes and property values. You must reduce the height limit zoning at Sprouts Shopping Center to 40 feet and the housing density to 0-29 du/ac and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54. Vote accordingly.

Sincerely,
Lynn & Steve Shields
5431 Barkla Street,
San Diego, CA 92122

From: Tom Fetter
To: Andrew Wiese; Lukes, Suchitra
Cc: chris.rowe@partners.mcd.com
Subject: [EXTERNAL] UNIVERSITY COMMUNITY PLANNING GROUP
Date: Tuesday, April 16, 2024 3:03:42 PM

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Suchi and Andy,

Thank you both for your work on this project. I built the Costa Verde Chevron/carwash 1989 and continue to operate it on land now leased from Alexandria Real Estate. I was active with Regency Centers during their processing of a renovation plan prior to their sale of the Center to ARE. Both our Chevron and the McDonald's next door have proven to be very high-volume units based on local demand. There are no alternate locations within the community and we believe the public would be disadvantaged for these particular uses were to be replaced with housing.

I have printed and read the entire April 9 Community Plan Update. It is an impressive document representing a substantial effort by the Planning Department. Rather than take time during the meeting my two comments are as follows:

- I support four of the Plan Priorities, but disagree with the objective of Maximizing Transit Investment Success. While the San Diego Metropolitan trolley is well used from San Ysidro to National City, it is sparsely used North from the Old Town station. I don't think that this investment will ever be successful, and I feel that using this goal for community planning is not justified.

- Adding 3000 new homes and 72,000 new jobs will increase the need for neighborhood servicing facilities and businesses. The removal of any existing consumer servicing retail would be a mistake. These uses are underserved already.

Thanks for your consideration.

Tom Fetter

From:	Johannes Wieland
To:	PLN University Community Plan Update
Subject:	[EXTERNAL] University Community Plan Comment
Date:	Tuesday, April 16, 2024 12:54:53 PM

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Hi,

I enthusiastically support for the proposed biking infrastructure, particularly on Governor and Genessee. I would like to bike with my kids to our great University City schools, but the current lack of infrastructure makes such a healthy and environmentally friendly choice prohibitively dangerous. I also strongly endorse any traffic calming measures on Stresemann, as traffic runs far above the speed limit particularly around school opening and closing times.

Thank you!

Johannes

From: Phillips, Laurie
To: PLN University Community Plan Update
Subject: [EXTERNAL] University Community Plan Comments
Date: Tuesday, April 16, 2024 11:42:12 AM

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- The City of San Diego has proposed a major increase in residential density for North UC. While the UCSD student population is a large body that supports this increase in the belief that it will reduce housing costs for students, most residents and homeowners find it excessive and objectionable. UCSD should be required to house it's student population. As we have already seen with the two large high rise complexes the city permitted as exceptions to the current zoning, those apartments opened at precisely 2X the going rate for units in North UC, for apartments ½ the size of existing units. Promptly rents across the area rose to meet those new high rises. The city has long claimed that it will require inclusion of low income units in all new projects, but has rather allowed for builders to wave that requirement for a fee.
- The Draft plan calls for a maximum density of 142 units per acre but the city has programs that allow a developer to double that density in exchange for addition of low income housing, however that low income housing does not need to be built in UC, and thus allows for double the proposed density for no benefit to the UC community
- The biggest issue I have with the City's plan is the lack of infrastructure to support the increased density. For the last four years the City has assured the community that they will provide a Parks, Traffic and Schools plan to meet the needs of their proposed density increase. They have returned a proposal that appears to be nothing more than a fantasy. They have failed to identify funding for any of the needed improvement, failed to identify adequate lands for increasing local schools, and while they have identified some lands they could potentially use to increase parks, those lands are largely on the outskirts of UC, not located near neighborhoods and not of sufficient size to serve are real parks. Counting parks points for postage sized bits of landscaping is reprehensible and an attempt to circumvent the city's own parks requirements. Mitigation fees once paid by developers to fund infrastructure needs now go to a general pool for the city to use in any community they view as underserved.
- The draft plan shows bike paths throughout UC. Note that none of those is a new Class 1 bike path. I ride my bicycle about 100 miles per week, but would never dare to ride the 3 miles from my home to work in UC as it is clearly too dangerous now, let alone when the density is raised to a level equal to Manhattan.
- The City justifies its densification of UC as an initiative to provide affordable housing to the high tech businesses in North UC. It fails to recognize that there has been a major shift in those business during the 4 years that we have been developing this plan. Most of the tech companies in the area have moved to flexible work space models,

dramatically reducing the number of days an office employee is required to work on site. This means that many office based staff have preferred to escape the high density housing market and relocate further from the office in more suburban space. At this time millions of square feet of vacant office and lab space goes unleased in UC, Mira Mesa and Sorrento Valley. Note that 25% of downtown San Francisco is vacant office space. It is folly to over densify UC with the thought that well paid tech employees are going to want to live in high rise apartments in an area with insufficient schools, inaccessible parks and nightmare traffic.

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From: Causman, Nathen
To: PLN University Community Plan Update
Subject: Fw: [EXTERNAL] Fwd: Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting
Date: Tuesday, April 16, 2024 9:48:08 AM
Attachments: UC Rally Logo.png

Nathen Causman
Senior Planner
City of San Diego
City Planning Department
T (619) 236-7225

From: Bonnie Kutch <bkutch@kutchco.com>
Sent: Monday, April 15, 2024 7:48 AM
To: Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>
Subject: [EXTERNAL] Fwd: Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting

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Good Morning, Suchi and Nathen:

Please let me know by what date you will have answers to these questions to me in writing. A great number of us are waiting and need to know.

Thanks,
Bonnie

Begin forwarded message:

From: Bonnie Kutch <bkutch@kutchco.com>
Subject: Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting
Date: April 13, 2024 at 3:01:55 PM PDT
To: "Lukes, Suchitra" <SLukes@sandiego.gov>, "Causman, Nathen" <NCausman@sandiego.gov>, "Alo, Leo" <lalo@sandiego.gov>, Coby Tomlins <CTomlins@sandiego.gov>, Heidi Vonblum <VonblumH@sandiego.gov>, Tait Galloway <tgalloway@sandiego.gov>, Kent Lee <KentLee@sandiego.gov>, "Gloria, Todd (External)" <mayortoddgloria@sandiego.gov>, Christopher Ackerman-Avila <cackermanavi@sandiego.gov>,

planningCEQA@sandiego.gov, Plan University <planuniversity@sandiego.gov>
Cc: Chris Nielsen <cn@adsc-xray.com>, Andy Wiese <awiese@sdsu.edu>, Andrea Contreras <andrea@sddirtlaw.com>, Help Save UC <helpsaveuc@gmail.com>

Dear City of San Diego Officials:

During the April 9th University City Planning Group meeting I attended in person, Suchi Lukes and Nathen Causman gave a 40-minute Zoom presentation of the city's revised University Community Plan Update and Draft EIR. Eight other city officials participated via Zoom. Suchi and Nathen gave a summary of the documents we had already reviewed when they were made available March 14th. These documents called for considerable clarification and substantiating, which we had expected city staff would be prepared to do.

Following city staff's presentation, members from the live audience and Zoom participants were given time to ask questions. However, Suchi, Nathen, Leo Alo, Coby Tomlin and consultants from Kyser Marston Associates were unable to answer the majority of our questions.
On behalf of the residents of University City who took the time and care to attend this meeting and pose our well-thought-out questions, I am requesting answers to each and every question below, in writing, by a date that is certain to give the community time to properly evaluate those answers, and ask our follow-up questions to those answers.

THIS EMAIL IS TO TO PUT YOU ON NOTICE THAT WE WANT THE APRPIL 30TH DEADLINE EXTENDED BECAUSE THE CITY WAS UNPREPARED TO ADDRESS THE PUBLIC'S QUESTIONS, MAKING THE MEETING A WASTE OF THE PUBLIC'S TIME AND MONEY AND SEVERELY CUTTING INTO THE SHORT 45-DAY REVIEW PERIOD WE WERE ALLOWED.

Questions That Still Need Answers:

1. Why was the Community Scenario in the city's revised UC Plan Update not included in the Draft EIR? Why would the Planning Department revive the "very high" Scenario 1 when it was discarded in July 2023? This makes no sense, and we need this question answered.

2. Why were the Sprouts and Vons shopping centers in south UC up-zoned to CC-3-8? Sprouts is not an existing TPA and likely never will be with MTS's budget problems; why would you consider adding as many as 572 housing units there? And how can you justify adding another 373 at Vons for a total of 945 housing units along Governor Drive, our only ingress/egress into south UC, when that artery is already heavily congested? And why would you up-zone for 100 feet high at both centers when that height would be so far out of scale with the surrounding community, depriving surrounding residents of their privacy, sunlight, safety and relative quiet?

3. Page S-25, Impact on Schools: The DEIR states that "Implementation of the University CPU could result in the need for additional fire/rescue, police, school, and library facilities. The location and need for potential future facilities cannot be determined at this time … " However, if you look at Appendix 12 of your documents, we see a memo from the San Diego Unified School District written six months ago that states that the UC Plan Update should have a location identified for new schools, and it specifically states it should be in the vicinity of Genesee and La Jolla Village Drive. How do you explain this glaring oversight, and what is your solution?

4. Funding mechanism: There is only $44 million in the budget currently for UC improvements. The Plan Update has been presented to UC residents by the city with plenty of colorful and attractive renderings of tree-lined streets and pathways, parks and other community enhancements. Will you properly explain what the funding mechanism will be for all the needed infrastructure, recreational facilities, improvements and services in UC when DIFs are being waived or redirected to other communities?

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I, along with many other members of the UC community, await your responses.

Sincerely,

Bonnie Kutch
Resident & Property-Tax Paying Homeowner, University City

Bonnie Kutch | University City Peeps | www.ucpeeps.org |619.299.1010

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From: Causman, Nathen
To: PLN University Community Plan Update
Subject: Fw: [EXTERNAL] Re: Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting
Date: Tuesday, April 16, 2024 9:47:38 AM
Attachments: UC Rally Logo.png

Nathen Causman
Senior Planner
City of San Diego
City Planning Department
T (619) 236-7225

From: Barbara Gellman <bggellman@yahoo.com>
Sent: Saturday, April 13, 2024 3:46 PM
To: Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; Alo, Leo <LAlo@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Vonblum, Heidi <VonblumH@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; Ackerman-Avila, Christopher <CAckermanAvi@sandiego.gov>; PLN_PlanningCEQA <planningceqa@sandiego.gov>; PLN University Community Plan Update <planuniversity@sandiego.gov>; Bonnie Kutch <bkutch@kutchco.com>
Cc: Chris Nielsen <cn@adsc-xray.com>; Andy Wiese <awiese@sdsu.edu>; Andrea Contreras <andrea@sddirtlaw.com>; Help Save UC <helpsaveuc@gmail.com>
Subject: [EXTERNAL] Re: Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Excellent summary and follow up questions. What is the purpose of voting for a representative if they do not choose to hear us and fight for what is right? Do any of them live in our community, walk our neighborhoods, visit our schools and recreation centers, speak with our Police and Fire crews and most of all, listen to our community residents? Our ideas are not tainted by power or money like theirs seem to be.

Barbara

On Saturday, April 13, 2024 at 03:02:40 PM PDT, Bonnie Kutch <bkutch@kutchco.com> wrote:

Dear City of San Diego Officials:

During the April 9th University City Planning Group meeting I attended in person, Suchi Lukes and Nathen Causman gave a 40-minute Zoom presentation of the city's revised University Community Plan Update and Draft EIR. Eight other city officials participated via Zoom. Suchi and Nathen gave a summary of the documents we had already reviewed when they were made available March 14th. These documents called for considerable clarification and substantiating, which we had expected city staff would be prepared to do.

Following city staff's presentation, members from the live audience and Zoom participants were given time to ask questions. However, Suchi, Nathen, Leo Alo, Coby Tomlin and consultants from Kyser Marston Associates were unable to answer the majority of our questions.
On behalf of the residents of University City who took the time and care to attend this meeting and pose our well-thought-out questions, I am requesting answers to each and every question below, in writing, by a date that is certain to give the community time to properly evaluate those answers, and ask our follow-up questions to those answers.

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Questions That Still Need Answers:

1. Why was the Community Scenario in the city's revised UC Plan Update not included in the Draft EIR? Why would the Planning Department revive the "very high" Scenario 1 when it was discarded in July 2023? This makes no sense, and we need this question answered.

2. Why were the Sprouts and Vons shopping centers in south UC up-zoned to CC-3-8? Sprouts is not an existing TPA and likely never will be with MTS's budget problems; why would you consider adding as many as 572 housing units there? And how can you justify adding another 373 at Vons for a total of 945 housing units along Governor Drive, our only ingress/egress into south UC, when that artery is already heavily congested? And why would you up-zone for 100 feet high at both centers when that height would be so far out of scale with the surrounding community, depriving surrounding residents of their privacy, sunlight, safety and relative quiet?

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To: PLN University Community Plan Update
Subject: Fw: [EXTERNAL] Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting
Date: Tuesday, April 16, 2024 9:47:06 AM
Attachments: UC Rally Logo.png

Nathen Causman
Senior Planner
City of San Diego
City Planning Department
T (619) 236-7225

From: Bonnie Kutch <bkutch@kutchco.com>
Sent: Saturday, April 13, 2024 3:01 PM
To: Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; Alo, Leo <LAlo@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Vonblum, Heidi <VonblumH@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; Ackerman-Avila, Christopher <CAckermanAvi@sandiego.gov>; PLN_PlanningCEQA <planningceqa@sandiego.gov>; PLN University Community Plan Update <planuniversity@sandiego.gov>
Cc: Chris Nielsen <cn@adsc-xray.com>; Andy Wiese <awiese@sdsu.edu>; Andrea Contreras <andrea@sddirtlaw.com>; Help Save UC <helpsaveuc@gmail.com>
Subject: [EXTERNAL] Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting

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Sincerely,

Bonnie Kutch
Resident & Property-Tax Paying Homeowner, University City

Bonnie Kutch | University City Peeps | www.ucpeeps.org |619.299.1010

From:	Chris Dimaggio
To:	PLN University Community Plan Update
Subject:	[EXTERNAL] Height Limits on Von"s and Sprouts Shopping Centers
Date:	Monday, April 15, 2024 9:16:40 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hello,

I am writing to ask you to remove the proposed 100FT height limit on the Governor and Genesee Von's shopping center and the Governor and Regents Sprouts shopping center.

I know you have visited our neighborhood here in South University City and it is obvious that 10 story buildings DO NOT fit within the character of our neighborhood. And if you dismiss this input as being against densification, you would be wrong, as I have for a long time felt that these two properties could be put to joint use retail/residential.
What would fit our neighborhood would be something in the area of 40ft with retail on the ground level and maybe two stories of residential above.
I would love to see more people be able to live in UC and enjoy the wonderful neighborhood we have here, but the growth should fit with the style of the neighborhood and not overwhelm the schools, parks, and roads which are not able to grow.

I look forward to seeing a common-sense growth plan from the city and common-sense compromises that take into account the hard working, tax paying residents of University City.

Thank you,
Chris DiMaggio
37 Year San Diego Resident
1995 SDSU Alum

From:	Diane Ahern
To:	PLN University Community Plan Update
Cc:	Andy Wiese; Chris Nielsen; CouncilMember Kent Lee; Burton, Zach; Lukes, Suchitra; Katie Nelson Rodolico
Subject:	[EXTERNAL] suggesting Speed Tables / Raised Crosswalks on Governor Drive and throughout University community neighborhood
Date:	Monday, April 15, 2024 1:22:08 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Good afternoon, I'm glad to see that traffic calming measures are planned for Governor Drive and are mentioned in the CPU. I hope you're not locked into road diets with a reduced number of traffic lanes on Governor Drive.

Based on information shared at the recent UCPG meeting, there has been no recent traffic study that supports removing lanes from Governor Drive. Governor Dr is home to three public schools, several houses of worship and pre-schools, many public ball fields and school/park joint use fields, an aquatic center, a recreation center, library, many senior and rental units, single family and ADU homes, banks, the post office, two retail centers with heavy pedestrian traffic ... and much more.

Rather than a road diet, we suggest the installation of a speed table or raised crosswalk along Governor Drive wherever there is a pedestrian crossing. Not only do they have the ability to slow traffic, they also increase the visibility of pedestrians and others who are traversing the intersections by making the crosswalk a few inches higher than the rest of the roadway. Slowing motorized vehicle traffic will also make it safer for cyclists and those who use motorized wheelchairs for local transportation.

There is information on the City's website about raised crosswalks. Additionally, from CalTrans: *A raised intersection is a vertical traffic calming device that raises the entirety of an intersection by three to four inches.* Reference: https://dot.ca.gov/programs/safety-programs/traffic-calming

Thank you for reading.

- Take care,
Diane and Tom Ahern
7151 Whipple Ave
University City / San Diego, 92122

From:	Diane Ahern
To:	PLN University Community Plan Update; CouncilMember Kent Lee; Burton, Zach; Chris Nielsen; Andy Wiese; Katie Rodolico
Cc:	CouncilMember Joe LaCava
Subject:	[EXTERNAL] re Mandell-Weiss Eastgate Park & JCC and the University Community Plan Update
Date:	Monday, April 15, 2024 12:50:30 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Good afternoon, after last week's UCPG meeting, it's my understanding that the Lawrence Family JCC and the Mandell-Weiss park are located on city-owned property. There are already a recreation center and pool and many park amenities located there on City property.

This city-owned park should be reclaimed and listed in the University community plan update as a current and future city public park. Not only should this park be reclaimed by the city, but the user fees should be adjusted to reflect city public park rates so that it is truly open to all. This is a community and city asset that should be accessible to all and at the same rate as other city parks and facilities.

Thank you for listening.

- Take care,

Diane and Tom Ahern
7151 Whipple Ave
University City DC6 residents, 92122

From: Jeff Dosick
To: PLN University Community Plan Update
Subject: [EXTERNAL] Bike Boxes Needed
Date: Monday, April 15, 2024 9:57:34 AM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

At least put painted bike boxes at the critical corners of Genesee and Governor.
All 4 corners.

Also Genesee and Nobel.
All 4 corners

When schools are in session you can see in the mornings a large number of students making left hand turns trying to avoid the cars.

Vision Zero?

Jeff Dosick

From:	Nigel OM
To:	PLN University Community Plan Update
Subject:	[EXTERNAL] Fw: UC Resident Opposed to Aspects of Draft Community Development Plan and Zoning Map for South University City
Date:	Sunday, April 14, 2024 8:45:04 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

I am a resident of University City and am alarmed by several aspects of San Diego's Development Plans for south UC.

I am opposed to any reduction in the traffic lanes of Governor Drive in south UC. Since it is our main traffic artery and the main road connecting to Genesee Avenue, lane reductions will cause severe traffic congestion, impede our ability to exit and return to our community, and impede emergency vehicles from reaching us quickly and slow evacuations in the event of a disaster. **Governor Drive should not be reduced to two lanes.** Replacing two of the lanes with bike lanes is just silly. I invite you to drive Governor Drive during school opening and closing times to see for youself.

I'm also calling on you to express my strong opposition to the City up-zoning our two south UC shopping centers to CC-3-8 zoning, which would further add to traffic congestion on Governor Drive and destroy the continuity of the surrounding residential community.

The Sprouts shopping center IS NOT an existing Transit Priority Area. Buses do not stop there frequently and it's a far distance from the trolley and an existing TPA. The zoning at the Sprouts center should be 0-29 dwelling units per acre, the height limit should be no more than 40 feet, and the setbacks should be at least 30 feet.

The Vons shopping center zoning should be reduced to 0-54 units per acre, the limit should be no more than 50 feet, and the setbacks should be at least 30 feet from residential properties.

I also vehemently oppose the building of any new gas stations. We should be building EV charging stations not new gas stations. Gas stations support the destruction of our climate and environment and will result in soil contamination at the station sites.

Thank you,
Nigel Crawford
Condon Dr, San Diego, 92122

From:	Sylvia Herbert
To:	PLN University Community Plan Update; Gloria, Todd; CouncilMember Kent Lee
Subject:	[EXTERNAL] Young Family Very Grateful for Proposed Community Plan
Date:	Sunday, April 14, 2024 3:25:39 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hello PlanUniversity, Mayor Todd Gloria, and Councilmember Kent Lee,

I just wanted to add my voice to those in support of the University City Community Plan update. With a young family, I cannot attend all the meetings but I want you to know that there are many of us who would benefit greatly from the plan!

I and my husband live in South University City (just south of Standley Park) and are professors of engineering at UCSD. Our toddler goes to the daycare at UCSD as well. We want so badly to bike to work, but are anxious about putting our toddler in a bike trailer on Gennessee with cars going 50 mph right next to us (and the sidewalk is not quite wide enough for the bike trailer). We've even tried to see if there's an easy illegal crossing across the tracks in Rose Canyon (and ended up getting covered in poison oak...)

Therefore, the proposed plan to add a buffered bike lane to Gennessee would make a huge impact on our day-to-day lives by allowing us to commute daily without a car.

Additionally, the plans to turn Governor Drive into a walkable/bikeable "main street" would transform our neighborhood and **make me much more comfortable having my kid walk to the elementary/middle schools and Rose Canyon.** Plus, the shopping centers are in major need of updating.

Finally, any and all efforts to help **connect those of us in South UC to the trolley station** are highly appreciated!

Thank you again. I know there are a lot of older people in my community who are resistant to the changes, but I think the people like me who are in the neighborhood every day going to work, sending kids to school and parks, and going on runs/walks will have a huge benefit to the proposed changes.

--
Cheers,
Sylvia Herbert
sylviaherbert.com

From: Jennifer Dunaway
To: Tomlins, Coby; Lukes, Suchitra; Vonblum, Heidi; Galloway, Tait
Cc: Bonnie Kutch; CouncilMember Kent Lee; Help Save UC
Subject: [EXTERNAL] Fw: Answers needed UC plan update
Date: Sunday, April 14, 2024 2:26:20 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Coby, Suchi:
Your staff work needs to be improved; there were a number of things missing from the latest draft and DEIR.

Why hasn't the City placed the new school that SDUSD states is needed at La Jolla Village Drive and Genesee in the Plan? Why did the DEIR state that the City doesn't know where it should go or what is needed (Page S 25) when the District told the City in September 2023 what and where facilities need to go?

Please update your documents. /R Jen Dunaway

> ----- Forwarded Message -----
> **From:** Jennifer Dunaway <jenniferd159@yahoo.com>
> **To:** PLN_PlanningCEQA <planningceqa@sandiego.gov>
> **Cc:** Help Save UC <helpsaveuc@gmail.com>; Bonnie Kutch <bkutch@kutchco.com>; CouncilMember Kent Lee <kentlee@sandiego.gov>
> **Sent:** Sunday, April 14, 2024 at 02:05:16 PM PDT
> **Subject:** Answers needed UC plan update
>
> Governor Drive should remain as four lanes. The arguments to make it two lanes is not based on science. Governor Drive is not in a TPA and is only served by one bus route that does not go the entire length of the street. Community feedback has been overwhelming to keep it at four lanes. The City is still relying on 9 year old traffic count data in a DRAFT existing conditions assessment, known as Appendix A in the Mobility Report. There were many public comments on the need for updated traffic count data. This needs to be done.
> The Shopping Center at Regents and Genesee (Sprouts Marketplace) is not in a TPA and should remain at current density levels. There is no justification for this strip mall to be changed to high density, just as any similar strip mall in San Diego City, that is on one minor bus route.
> The EIR incorrectly states on page S 25 that public facilities cannot be identified and placed at this time. This is incorrect since the new density is already in the Draft Plan and known areas for more population is already identified in the Draft Plan. The school district actually pinpointed a location for a new school in Appendix I2. Other facilities can be located as well and the DEIR needs to place them.
> The emergency evacuation plan is flawed as it relies on current roadway and transportation systems to provide egress. The City is proposing to change most streets to less lanes and less egress, and the new evacuation plan needs to be studied under Plan proposal conditions.
> The Community Preferred Scenario was active in July 2023 during the UCPG Subcommittee meeting. The City stripped it out of the DEIR without any notice or explanation. IT SHOULD BE IN THE DEIR as it was a scenario that the Subcommittee put forward. Redo the EIR with this alternative.
> The UCPG Subcommittee in its July 2023 minutes, highlights that the City needs to identify funding and plans for infrastructure as a result of more density. The DEIR and the latest Draft Plan do not do this. This needs to be done, specifically the 910,000,000 that the School District highlights needs to be found for a new school BEFORE new units are built.
> The Existing UC Plan states Community Goals. These were deleted from the Current Draft. They ened to be included.
> Community Engagement does not have any data on number of comments, what the comments were

for and one on one meetings between Nancy Graham and special interest groups. The Community Engagement piece also does not reference two Community Protests on March 11, 2023 and May 6, 2023 against the City preferred scenario, the May 16, 2023 lengthy HELP SAVE UC presentation, the April 6, 2023 Petition by UC PEEPS with specific comments on the Plan and how those comments were integrated into the latest Draft. This needs to be included and the comments need to be explained and weaved into the latest Draft.

From: Jennifer Dunaway
To: Tomlins, Coby
Cc: Lukes, Suchitra; Chris Nielsen; Andrew Wiese; Bonnie Kutch; Help Save UC; CouncilMember Kent Lee
Subject: [EXTERNAL] Re: staff preparedness and ability to answer questions - UC Plan Update and DEIR
Date: Sunday, April 14, 2024 2:07:08 PM

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Coby:
When are your city staffers going to study the Community preferred option in the DEIR? The July 2023 UCPG subcommittee meeting minutes were pretty clear on what was moving forward. This was a big error on the City's part.
/R Jen Dunaway

> On Friday, April 12, 2024 at 05:13:26 PM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:
>
> Coby:
> I left you a voicemail just now. We in the community expect City staff to be respectful of our time just as we are of yours. We expect answers on a city developed and owned document from city staff. Answers such as "that is a great question" or "send an email" or "we have to regroup on that" are not answers at this stage of the process.
>
> Please be prepared on Tuesday to give answers to the public on the City generated document. /R Jen Dunaway

From:	Barbara Gellman
To:	Lukes, Suchitra; Causman, Nathen; Alo, Leo; Tomlins, Coby; Vonblum, Heidi; Galloway, Tait; CouncilMember Kent Lee; Gloria, Todd; Ackerman-Avila, Christopher; PLN_PlanningCEQA; PLN University Community Plan Update; Bonnie Kutch
Cc:	Chris Nielsen; Andy Wiese; Andrea Contreras; Help Save UC
Subject:	[EXTERNAL] Re: Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting
Date:	Saturday, April 13, 2024 3:46:21 PM
Attachments:	UC Rally Logo.png

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Excellent summary and follow up questions. What is the purpose of voting for a representative if they do not choose to hear us and fight for what is right? Do any of them live in our community, walk our neighborhoods, visit our schools and recreation centers, speak with our Police and Fire crews and most of all, listen to our community residents? Our ideas are not tainted by power or money like theirs seem to be.

Barbara

On Saturday, April 13, 2024 at 03:02:40 PM PDT, Bonnie Kutch <bkutch@kutchco.com> wrote:

Dear City of San Diego Officials:

During the April 9th University City Planning Group meeting I attended in person, Suchi Lukes and Nathen Causman gave a 40-minute Zoom presentation of the city's revised University Community Plan Update and Draft EIR. Eight other city officials participated via Zoom. Suchi and Nathen gave a summary of the documents we had already reviewed when they were made available March 14th. These documents called for considerable clarification and substantiating, which we had expected city staff would be prepared to do.

Following city staff's presentation, members from the live audience and Zoom participants were given time to ask questions. However, Suchi, Nathen, Leo Alo, Coby Tomlin and consultants from Kyser Marston Associates were unable to answer the majority of our questions.
On behalf of the residents of University City who took the time and care to attend this meeting and pose our well-thought-out questions, I am requesting answers to each and every question below, in writing, by a date that is certain to give the community time to properly evaluate those answers, and ask our follow-up questions to those answers.

THIS EMAIL IS TO TO PUT YOU ON NOTICE THAT WE WANT THE APRPIL 30TH DEADLINE EXTENDED BECAUSE THE CITY WAS UNPREPARED TO ADDRESS THE PUBLIC'S QUESTIONS, MAKING THE MEETING A WASTE OF THE PUBLIC'S TIME AND MONEY AND SEVERELY

CUTTING INTO THE SHORT 45-DAY REVIEW PERIOD WE WERE ALLOWED.

Questions That Still Need Answers:

1. Why was the Community Scenario in the city's revised UC Plan Update not included in the Draft EIR? Why would the Planning Department revive the "very high" Scenario 1 when it was discarded in July 2023? This makes no sense, and we need this question answered.

2. Why were the Sprouts and Vons shopping centers in south UC up-zoned to CC-3-8? Sprouts is not an existing TPA and likely never will be with MTS's budget problems; why would you consider adding as many as 572 housing units there? And how can you justify adding another 373 at Vons for a total of 945 housing units along Governor Drive, our only ingress/egress into south UC, when that artery is already heavily congested? And why would you up-zone for 100 feet high at both centers when that height would be so far out of scale with the surrounding community, depriving surrounding residents of their privacy, sunlight, safety and relative quiet?

3. Page S-25, Impact on Schools: The DEIR states that "Implementation of the University CPU could result in the need for additional fire/rescue, police, school, and library facilities. The location and need for potential future facilities cannot be determined at this time … " However, if you look at Appendix 12 of your documents, we see a memo from the San Diego Unified School District written six months ago that states that the UC Plan Update should have a location identified for new schools, and it specifically states it should be in the vicinity of Genesee and La Jolla Village Drive. How do you explain this glaring oversight, and what is your solution?

4. Funding mechanism: There is only $44 million in the budget currently for UC improvements. The Plan Update has been presented to UC residents by the city with plenty of colorful and attractive renderings of tree-lined streets and pathways, parks and other community enhancements. Will you properly explain what the funding mechanism will be for all the needed infrastructure, recreational facilities, improvements and services in UC when DIFs are being waived or redirected to other communities?

5. In Leo Alo's explanation of the city's "Traffic Analysis", he stated that VMT was the new standard of measuring traffic. However, the VMT data collected by the city was obtained from SANDAG's Series 14 Activity Based Model, ***which is now eight years old***. We have an expert witness who can testify that, under base year conditions, the ***University CPU exceeds the thresholds by being above 85 percent*** of the regional means for both VMT per Capita and VMT per Employee, as well as 90 percent and 126 percent of the Base Year regional means, respectively. By 2050, with the implementation of the UCPU, the VMT is projected to be 60 percent and 85.3 percent, respectively, of the Base year Regional means. ***No part of the UCPU may go forward without a current, thorough Traffic Study performed at peak traffic times. This is particularly true for Governor Drive.***

6. Nearly 100 percent of the housing demand citywide is for for-sales homes to house entire families, while rental apartments have been far overbuilt. Yet, it appears that the UCPU is being up-zoned entirely for more high-rise apartments rather than single-family or multi-family for-sale homes. Nathen's explanation that many of the apartments could be for-sale condos, but he offered no solution for families with children and pets who need multiple bedrooms and readily accessible yards or other outdoor recreational space. If the city's goal is to provide more housing for the people who work in UC and won't have to commute long distances, then are you assuming that UC's workforce is entirely young, single and childless?

7. There was no proper answer given to the question of how Complete Communities Housing Solutions plays into the overall UCPU and how it's expected to add to the overall housing density, impact traffic, further burden existing infrastructure, and skew the number of DU/AC on the Plan Update's density map. If CCHS is not under the purview of the Planning Department, as Nathen stated, then how is this being tracked and calculated? Who's keeping score?

8. There was not adequate explanation as to how the Plan Update will ensure there is enough retail to

serve the residents of UC. If UC residents are forced to drive to Clairemont or Del Mar to do their shopping, does that not defeat the city's goal of cutting down VMT?

9. There was no response to the point made about SANDAG's Series 15 population projection of there being a mere 65,000 additional people in all of San Diego between 2022 and 2050, which means the UCPU aims to add 40 times the housing units needed in UC alone!! How can the city justify this?

Additional Questions That Need Answers

10. Explain where the 1.8 recreation centers missing from the UCPU will go, and what mitigation efforts have been done. Explain how the one new recreation center the city has proposed at the Shiley Eye Center at Scripps Torrey Pines could possibly serve nearby residents when there are no residences in that area.

11. Explain how the two additional parks that the city says will be added can possibly function as neighborhood/community parks when they are nothing more than small strips of land away from residences and could not possibly accommodate a game of soccer, baseball, or other activities. The Draft EIR states that the city cannot ensure it will build any more recreational facilities, so where do you imagine people will have any outdoor recreational areas at all when it adds 65,000+ more people?

12. The Draft UC Community Plan had "Community Goals". The city's revised Plan Update eliminates all those goals and only lists "City of San Diego Goals." Why?

13. The Draft EIR discusses current fire station placement but does not say where new fire stations will be build to serve the added population in UC. Explain how this is being addressed.

14. UC is already short of police coverage and we are already far behind city targets. Why have additional police force or stations not been offered? And what has the official response been from the Police Department?

15. In the Community Engagement document, no mention is made of the petition submitted by UC PEEPS in March 2023 with close to 2,200 signatures objecting to the city's proposed plans; in fact, we received no response from city officials about that petition whatsoever. No mention is made of the three large-scale protests against the city's high-density housing plans held in UC and across the city. No mention is made of the thousands of letters submitted by community residents to city officials opposing their Plan Update. No mention was made of the extensive media coverage generated against the city's proposed Plan Update. Why was this not included in the Community Engagement document?

I, along with many other members of the UC community, await your responses.

Sincerely,

Bonnie Kutch
Resident & Property-Tax Paying Homeowner, University City

Bonnie Kutch | University City Peeps | www.ucpeeps.org |619.299.1010

From:	Bonnie Kutch
To:	Lukes, Suchitra; Causman, Nathen; Alo, Leo; Tomlins, Coby; Vonblum, Heidi; Galloway, Tait; CouncilMember Kent Lee; Gloria, Todd; Ackerman-Avila, Christopher; PLN_PlanningCEQA; PLN University Community Plan Update
Cc:	Chris Nielsen; Andy Wiese; Andrea Contreras; Help Save UC
Subject:	[EXTERNAL] Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting
Date:	Saturday, April 13, 2024 3:02:31 PM
Attachments:	UC Rally Logo.png

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I, along with many other members of the UC community, await your responses.

Sincerely,

Bonnie Kutch
Resident & Property-Tax Paying Homeowner, University City

Bonnie Kutch | University City Peeps | www.ucpeeps.org |619.299.1010

From: mark w
To: PLN University Community Plan Update
Subject: [EXTERNAL] Re: Announcing the Apr. 16 University Community Plan Update Subcommittee Meeting
Date: Friday, April 12, 2024 10:02:25 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Forgive me -- but this plan is a g*damn joke! Developers have been lusting after UC for decades to convert low-density living into high-density "tenements" -- aka UTC. No thanks!

On Friday, April 12, 2024 at 08:03:48 AM PDT, City of San Diego City Planning Department <planuniversity@sandiego.gov> wrote:

Announcing the University Community Plan Update Subcommittee Meeting

The University Community Plan Update Subcommittee will meet on **Tuesday, April 16 at 6 p.m. on Zoom**. The purpose of this meeting is to collect comments on the draft community plan and draft Environmental Impact Report. View the agenda for more details, including Zoom link and telephone instructions.

At the April 9 University Community Planning Group meeting, City staff presented an information item on the University Community Plan Update. The presentation materials and recording for that meeting are also available.

Plan University Website

City of San Diego | 9485 Aero Dr., San Diego, CA 92123

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Try email marketing for free today!

From:	Jennifer Dunaway
To:	Tomlins, Coby
Cc:	Lukes, Suchitra; Chris Nielsen; Andrew Wiese; Bonnie Kutch; Help Save UC; CouncilMember Kent Lee
Subject:	[EXTERNAL] staff preparedness and ability to answer questions - UC Plan Update and DEIR
Date:	Friday, April 12, 2024 5:13:33 PM

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Coby:
I left you a voicemail just now. We in the community expect City staff to be respectful of our time just as we are of yours. We expect answers on a city developed and owned document from city staff. Answers such as "that is a great question" or "send an email" or "we have to regroup on that" are not answers at this stage of the process.

Please be prepared on Tuesday to give answers to the public on the City generated document. /R Jen Dunaway

From:	Jennifer Dunaway
To:	PLN_PlanningCEQA; Lukes, Suchitra; Tomlins, Coby
Cc:	Help Save UC; Bonnie Kutch; Andrew Wiese; Andrea Contreras
Subject:	[EXTERNAL] UCPG Minutes July 11, 2023 - Scenarios for UC Plan and the DEIR
Date:	Wednesday, April 10, 2024 3:56:01 PM

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Coby and Suchi and CEQA mailbox:

10 city staffers could not answer Mr. Weise's question last night as to why the Community Scenario was not included in the Draft EIR.

Per the minutes from the UCPG meeting, " Two alternative land use scenarios - a Staff Preferred Scenario and a Community Planning Group Subcommittee Input Scenario. The Discussion Draft does not include:
- A proposal to rezone single family residential areas for townhouses.
- The very high density “Scenario 1.” "

Link to minutes here: https://urldefense.com/v3/__https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usrfiles.com/ugd/bf5c85_4f7352b49cd645b19da4709cc4855c22.pdf__;!!OBed2aHXvKmHymw!1xBS6jIm6LZN0v2ugsu_P7U4H3k3t8mCA-j5kKhqY0E-LndGJ-y5npQvbHfD1c1cvI3ytazID7E2morXfBr0lCy5$

This begs the question asked last night - why wasn't the Community's Scenario in the DEIR? Why did City Planning revive the "very high" Scenario 1 when it was discarded in July 2023?

This is not how the process is supposed to work with identifying scenarios and then performing the EIR. The ten city employees present at last night's meeting could not answer how that got into their own document.

Please advise how the City Planning staff intends to fix this problem./R Jen Dunaway

From:	Neil Hyytinen
To:	PLN University Community Plan Update
Cc:	Galloway, Tait; Tomlins, Coby
Subject:	[EXTERNAL] ARE//Costa Verde - University CPU request
Date:	Wednesday, April 10, 2024 10:44:35 AM
Attachments:	image001.png

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Coby, Tait and team – on behalf of ARE, we'd like to formally request that the proposed zoning for ARE's Costa Verde site be changed to RMX-3 instead of the currently proposed EMX-3 zone and that the corresponding Land Use Designation be changed to "Urban Village High-3" instead of the currently proposed "Urban Employment Village High-3".

We've reviewed the VMT technical report in the draft PEIR and are confident that these changes wouldn't trigger the need for any additional environmental analysis and is consistent with the Guiding Principals and Goals and Policies in the draft CPU.

Thanks for your consideration.

Neil

Neil Hyytinen
Hecht Solberg Robinson Goldberg & Bagley LLP
600 West Broadway, Suite 800
San Diego, CA 92101
D: 619.685.4130 C: 858.610.5420
nhyytinen@hechtsolberg.com

HechtSolberg
www.hechtsolberg.com

From:	Karen Martien
To:	PLN University Community Plan Update
Subject:	[EXTERNAL] Comment on Draft University City Community Plan
Date:	Tuesday, April 9, 2024 9:08:17 PM
Attachments:	CM Lee website.png Neighborhood marker.png

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The name of our community is incorrect throughout the entire plan. The name of the community is University City, not University Community. I've attached screenshots of Councilmember Lee's website, which correctly lists us as University City, as well as a screenshot of the stone entry marker to our neighborhood that shows the name as University City.
Thank you, Karen

From:	Trudy Love
To:	PLN University Community Plan Update
Cc:	awiese@sdsu.edu; CouncilMember Kent Lee; Nguyen, Dustin; Gloria, Todd; CouncilMember Joe LaCava; Help Save UC
Subject:	[EXTERNAL] Save UC
Date:	Tuesday, April 9, 2024 3:37:44 PM

This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.

Hi Nancy,
My husband wrote and has already sent this to you, but I feel exactly the same. Please take the time to reread and forward to anyone that can help stop some of these extreme changes.

Thank you in advance for considering the opinions and concerns of the people who live next to these shopping centers. I live across the street from the Spouts shopping center and the proposed changes would effectively destroy the quality of life that we bought into 20 years ago. You have to live somewhere to truly understand how changes such as the proposed ones would impact one's quality of life. I know there are only a limited number of people who live so close to these shopping centers, but in many ways we are the ones that will be most impacted by the changes, so I am hoping that comments like mine will help you and the other people involved in this process do the right thing and consider how you would feel if your homes were across the street from one of these shopping centers. Imagine spending your career working hard to afford to live here and enjoy the neighborhood as it has been for the past 20 years, and then finding out that you are going to be robbed of that privilege. I use these strong words because I sincerely feel this way. I understand that change is inevitable, but the negative impacts of that change would be drastically reduced for me and me and my family if the plan modifications suggested by Help Save UC are followed.

I support the following modifications to the plan:

The **maximum density for Sprouts** should be 29 dwelling units/acre and the **maximum density for Vons** should be 54 dwelling units/acre (not 73 dwelling units/acre as proposed by the City).
The **height limit at Sprouts** should be 40 feet and the **height limit at Vons** should be 50 feet (not 100 feet as stated by Ms. Graham at a recent subcommittee meeting). Having a 100 foot tall building across the street from our back yard would limit sunlight, create unbearable amounts of noise (it's already much noisier than desired), and be demoralizing since we moved here to avoid exactly this kind of population density and high rise buildings.

The **setbacks at both locations** should be at least 30 feet from adjacent residential properties.

Community/neighborhood retail services such as grocery stores, pharmacies, post

offices, restaurants, etc., must be retained. The Draft Plan only “encourages” these services to be retained. Once again, we purchased this house for many reasons, one of which was the proximity to shopping and the walkable lifestyle that creates.

The current number of **commercial parking spaces** at each location should be kept, and residential projects must require at least one **residential parking space** per dwelling unit. The Draft Plan does not currently discuss the number of spaces for commercial or residential use. Instead, it proposes “unbundled” residential parking, meaning that residential parking fees would be charged separately from housing, possibly leading to residents parking off site. Considering that parking is already impossible in our neighborhood during the hours of drop off and pick up from school, any plan that assumes that residents of the complex would park in the surrounding streets is not viable and a major imposition to those of us who live here and park our own cars in the street.

In addition my wife and I support all of the changes to the Community Discussion Draft Plan requested by Help Save UC in its letter dated May 4, 2023.

Thank you again for your service and your consideration of my situation and that of my neighbors, who all feel the same way.

Best regards,

Trudy Love

--

Create your WiseStamp email signature

From:	Paul Love
To:	PLN University Community Plan Update
Cc:	cn@adsc-xray.com; awiese@sdsu.edu; CouncilMember Kent Lee; Nguyen, Dustin; Gloria, Todd; CouncilMember Joe LaCava; Help Save UC
Subject:	[EXTERNAL] Regarding proposed changes to Sprouts and Vons Shopping Centers in University City
Date:	Tuesday, April 9, 2024 10:34:22 AM

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Hi Nancy,

Thank you in advance for considering the opinions and concerns of the people who live next to these shopping centers. I live across the street from the Spouts shopping center and the proposed changes would effectively destroy the quality of life that we bought into 20 years ago. You have to live somewhere to truly understand how changes such as the proposed ones would impact one's quality of life. I know there are only a limited number of people who live so close to these shopping centers, but in many ways we are the ones that will be most impacted by the changes, so I am hoping that comments like mine will help you and the other people involved in this process do the right thing and consider how you would feel if your homes were across the street from one of these shopping centers. Imagine spending your career working hard to afford to live here and enjoy the neighborhood as it has been for the past 20 years, and then finding out that you are going to be robbed of that privilege. I use these strong words because I sincerely feel this way. I understand that change is inevitable, but the negative impacts of that change would be drastically reduced for me and me and my family if the plan modifications suggested by Help Save UC are followed.

I support the following modifications to the plan:

The **maximum density for Sprouts** should be 29 dwelling units/acre and the **maximum density for Vons** should be 54 dwelling units/acre (not 73 dwelling units/acre as proposed by the City).
The **height limit at Sprouts** should be 40 feet and the **height limit at Vons** should be 50 feet (not 100 feet as stated by Ms. Graham at a recent subcommittee meeting). Having a 100 foot tall building across the street from our back yard would limit sunlight, create unbearable amounts of noise (it's already much noisier than desired), and be demoralizing since we moved here to avoid exactly this kind of population density and high rise buildings.

The **setbacks at both locations** should be at least 30 feet from adjacent residential properties.

Community/neighborhood retail services such as grocery stores, pharmacies, post offices, restaurants, etc., must be retained. The Draft Plan only “encourages” these services to be retained. Once again, we purchased this house for many reasons, one of which was the proximity to shopping and the walkable lifestyle that creates.

The current number of **commercial parking spaces** at each location should be kept, and residential projects must require at least one **residential parking space** per dwelling unit. The Draft Plan does not currently discuss the number of spaces for commercial or residential use. Instead, it proposes “unbundled” residential parking, meaning that residential parking fees would be charged separately from housing, possibly leading to residents parking off site. Considering that parking is already impossible in our neighborhood during the hours of drop off and pick up from school, any plan that assumes that residents of the complex would park in the surrounding streets is not viable and a major imposition to those of us who live here and park our own cars in the street.

In addition my wife and I support all of the changes to the Community Discussion Draft Plan requested by Help Save UC in its letter dated May 4, 2023.

Thank you again for your service and your consideration of my situation and that of my neighbors, who all feel the same way.

Best regards,
Paul

From:	Katie Nelson Rodolico
To:	Lukes, Suchitra; Causman, Nathen; PLN University Community Plan Update; PLN_PlanningCEQA
Subject:	[EXTERNAL] Some questions on the EIR for blueprint/UCPU/Hillcrest FPA
Date:	Monday, April 8, 2024 9:44:14 AM

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Hi Suchi and Nathen -

I'm not sure if questions on the EIR should be sent to you, but I only have a generic email for commenting on the EIR. Is there a program manager for the PEIR? Since the University Community Plan Update is integrated with the Bluepint/UCPU/Hillcrest PEIR, I'm going to ask you. Thanks in advance for forwarding this if you are not the appropriate people.

Appendix J, VMT analysis:
- Did any of the model runs include the "High Density" versions of the UCPU or the Hillcrest FPA? Reading through Appendix J there is no discussion of these high density versions being analyzed.

Appendix J, VMT; Appendix B-2 (of Appendix J), page 32 of the PDF for Appendix J, Page 2 of appendix b2 within Appendix J:
- There are links at the bottom of the page. These are not available to the public, yet the analysis is supposed to be available to the public. I have an arcgis account but can't access those links. Can you amend the permissions so that we, the public can see the visualizations linked as MR1, MR2, and MR3?

Thank you,

Katie Rodolico
Member of the UCPU subcommittee as the UCCA representative. UCPG &UCPU liaison for University City Community Association.

From: Don McGrath
To: PLN University Community Plan Update
Subject: [EXTERNAL] OBJECTION TOTHE UNIVERSITY CITY MASTER PLAN
Date: Thursday, April 4, 2024 1:27:53 PM

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.. TO: THE SANDIEGO CITY
FROM; DONALD MCGRATH ll, ''RESIDENT" OF UNIVERSIYTY CITY, 5374 BLOCHST ,SAN DIEGO, CALIF. 92122
SUMMARY: RESIDENT HAS BEN A RESIDENT O UC FOR OVER YEARS. HEAN HIS WIFE CONNIE HAVE PLANNED THEIR WHOLE LIFE AROUND LIVING AND RETIRINGING IN THE UC AREA AT THEIR PRESENT ADDRESS WHICH OVER LOOKS HGWY 5 AND HGWY 52. TTHIR HOME IS ON THECANYON THA ABUTS THESE TWO HGWYS. THEIR ONLY ACESS IN AND OUT OF THIS AREA IS TO GO UP BLOCH STREET AND TURN ONTO STRESSMAN ROAD AND TURN RIGGHT ON PENNANT TO GOVERNOR DRIVE OR STERESSMAN TO GOVERNOR DRIVE.EITHER WAY DOES NOT PROVIDE FWY ACESS UNLES RIGHTTURNS ARE MADE AT REGENTS OR GENESEE TO FWY"S AT THE BOTTOM OF THOSE STREETS,

MAJOR COMPLAINT: FIRE SAFETY: WHERE WE LIVE IS AT THE VERY END OF UC TO THE SOUTH. THE UCP PROVIDES FOR A BIKE LANE DOWN GOVERNOR (one lane in either direction) . THE NEAREST FIRE STATION IS LOCATED AEITHER AT THE FOOT OF LAJOLLA PKWY OR BY LA JOLLA COUNTRY DAY SCHOOL BOTH OF WHICH ARE VERY FAR FROM OUR HOUSE. IN THE EVENT OF A FIRE EMERGENCY VEHICLES WOUL HAVE TO TRAVEI DOWN GENESEE TO GOVERNOR AND PROCEED ON AONE LANE ROAD (GOVERNOR), TOOUR HOME. GOVERNOR WILL BE LITTERED WITH BICYCLES AND TWO WAY TRAFFIC TRYING TO GET OUT OF THE NEIGHBOR HOOD TO EVADE ANY FIRE. THIS TRAFFICC BOTH WAYS WILL MAKEFIRE VEHICLE ACCESS IMPOSSIBLE (IF FIRE TRUCKS COME FROM LAJOLLA THE PROBLEM WILL BE SIMILAR WITH NARROW CITY RESIDENTIAL STREETSMAKING ACCESS EVEN MORE DIFFICULT.)

SUB SUMMARY;RSESIDENT FURTHER OBJECTS TO THE WASTE OF PLANNING FOR ANOTHER 800 APTS, LAST SUNDAY'S UT STATED WE HAD LOST 31'000 PERSONS IN THE COUNTY THIS YEAR AND WOULD LOSE MORE EVERY FROM HERE ON. SO THE QUESTION IS WHY DO WE NEED 800 NEW APTS? FINALLY WHY DON'T YOU EVER DO A MASTER PLAN FOR LA JOLLA? WHY DO YOUKEEP GANGING UP ON UC? IN MY OPINION EVERYONE WHO LIVES IN THIS AREA AND IS HAPPY WITH THE AREA BUT IF YOU CONTINUE WITH THIS NONSENSE MY RECOMMENDATION IS FOR ALL THE RESIDENTS TO SUE TO STOP THIS UNEEDED
PLAN.

From: Petkov, Rossen
To: PLN University Community Plan Update
Subject: [EXTERNAL] University Community Plan March 2024 - Comments
Date: Wednesday, April 3, 2024 1:57:03 PM

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Hello,
My name is Rossen Petkov and my family and I are University City residents since 1998 and homeowners since 2002. I love our neighborhood, I strongly care about how it evolves and develops over time and am concerned with some of the proposals in his plan. Therefore, as a resident of more than 25 years, as a homeowner and as a father seen my children grow and attend local schools, I decided to express my opinion and provide feedback for you to consider.
I firmly believe this commission and this plan should take into consideration and reflect the feedback, recommendations, and opinions of the University City residents. These are the people who actually pay the taxes (property, local, etc.) so their voice should matter the most.

My key comments are:

- I oppose the plan that effectively calls for more than doubling the number of University City residents and dwellings. This plan proposes building new hi-rises and ADUs, which I oppose. This will forever change what University City is, it's atmosphere and character. It will lead to a high-density community, more congestion, worsen traffic, less resources and ultimately a cramped area, exceeding its natural livable capacity
- I'm against building multiple new residential units at the Sprouts and Vons Shopping Centers. These spaces are suitable for shopping places or services, not to build more apartments
- I'm firmly against converting Governor Drive from four driving lanes down to two. It is a major street, connecting among others, four schools in a half a mile radius. Converting to two lanes will cause enormous traffic degradation and make morning and afternoon commute a lot worse than now. I would like to see a study about consequences of this proposal, what it would do to traffic and daily lives of people. How many people are assumed will be using the biking lanes daily vs. inconveniencing all remaining commuters/drivers. I will support bike lanes only if the four car lanes on Governor Drive are kept.

I expect a response to my concerns as well as for them to be taken into consideration when reviewing this plan.
Please let me know how exactly my feedback will be taken into account.

Respectfully,
Rossen Petkov – University City resident

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From:	Katie Nelson Rodolico
To:	PLN University Community Plan Update; Lukes, Suchitra; Causman, Nathen
Cc:	Chris Nielsen; Andy Wiese; CouncilMember Kent Lee; Burton, Zach; Jemma Samala; Diane Ahern; Tomlins, Coby
Subject:	[EXTERNAL] Question about the Plan Update and EIR
Date:	Friday, March 29, 2024 6:06:24 PM

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Hi Suchi and Nathen:

I've been reviewing the draft University Plan and the EIR that goes with it. I have a very basic question with the EIR.

Other EIRs I've read have always included a "no project", the proposed project, and an alternative that addresses the impacts. This EIR seems to be grouping things differently - perhaps because it has 3 projects (Blueprint, University, and Hillcrest) and 4 alternatives...

As described on pages S-6 through S-7 of the EIR it lists the alternatives as:

1) No project
2) University plan update AND Hillcrest Focused plan amendment
3) Blueprint Distributed Growth
4) Blueprint Reduced Density

My questions are as follows:

A) Are Hillcrest and University JOINED so that to accept one, you must accept the other? That's the way it seems in this EIR - at least as the options are considered.

B) Is the option for Hillcrest/University (option 2) an *alternative* to Blueprint (option 3 or 4)? Can you have BOTH Blueprint (either option) AND the plan amendment/updated plan (option 2).

C) if Option 2 is compatible with Option 3 or 4, is there an ALTERNATIVE to the University and/or Hillcrest plans with lower density? If option 2 can exist independent of option 3 or 4, then the alternative for option 2 is missing.

Please let me know what I am misunderstanding here.

Best Regards,

Katie Rodolico

University Plan Update Subcommittee member as representative to UCCA.

From: Judson Boomhower
To: PLN University Community Plan Update
Subject: [EXTERNAL] Support for bicycle improvements in South University City
Date: Tuesday, March 26, 2024 2:23:46 PM

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Hello,

I am a homeowner in South University City (on Huggins Street). I have looked through the proposed mobility improvements and want to register my enthusiasm for the proposed bicycle improvements, especially the proposed new bike lanes on Governor and Genessee. I and many other cyclists use those roads to bike to work in the UCSD area. These improvements are badly needed; the current status quo for bike lanes is quite poor and really severely limits the safety of bike travel.

Assuming the proposed plans are adopted later this year, when can we expect these new bike improvements to actually get built? Our family will be eagerly waiting.

Thanks,

Judson

From: Carey Algaze
To: PLN University Community Plan Update
Subject: [EXTERNAL] Possible Error on Figure 3 Planning Land Uses
Date: Tuesday, March 26, 2024 9:39:54 AM

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Good morning,

Thank you for providing the updated draft of the University Community Plan. In reviewing the updated draft, I believe there may be an error on Figure 3: Planning Land Uses that I wanted to bring to your attention.

Figure 3 identifies the Urban Employment Village High-2 has density of 0-145 du/ac with FAR of 3.0. However, When I look to the implementing zoning map Zoning Map, High 2 has a FAR of 5.0. Additionally, the Urban Village High-2 residential use designation has a density of 0-145 du/ac states an FAR of 5.0. Based on this, it seems Figure 3 may erroneously be stating the FAR of 3.0.

Can you please confirm that is the case or if I am misunderstanding the intention of the FAR for the Urban Village High-2 land use category?

Thanks!

Carey Algaze
Director, Development

T 858-290-0921 | M 310-486-8361
calgaze@ighgreit.com
www.ighgreit.com
674 Via De La Valle, Suite 206, Solana Beach, CA 92075

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From: Graham, Nancy
To: Chelsea Connelly
Cc: PLN University Community Plan Update
Subject: RE: [EXTERNAL] University City
Date: Friday, March 22, 2024 1:35:05 PM

Hi Chelsea –

I am no longer working in the Planning Department, so I am not overseeing the University Community Plan Update. I've cc'ed this email to the Plan University central inbox so the team will receive your comment.

Take care.

Nancy Graham, AICP
Program Manager, Entitlements & CEQA Compliance
City of San Diego
Engineering & Capital Projects Department

T (619) 236-6891
sandiego.gov
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From: Chelsea Connelly <cbrynn3@yahoo.com>
Sent: Friday, March 22, 2024 1:29 AM
To: Graham, Nancy <NHGraham@sandiego.gov>
Subject: [EXTERNAL] University City

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Dear Mrs. Graham,

I urge you to reconsider your revised plan to add high density"affordable housing" to the planned for areas in our neighborhood. Not only are you eliminating our neighborhood hub where our community gathers, it is an extreme fire risk which not only puts our lives at risk, it could be a liability for the city should you move forward without consideration. These decisions are being made without thought of the people and families who already live in these neighborhoods. I urge you to reconsider!

Concerned resident,

Sent from my iPhone
Sent from my iPhone

From: Donna Koziol
To: PLN University Community Plan Update
Subject: [EXTERNAL] South University City plans
Date: Saturday, March 16, 2024 2:11:01 PM

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I looked at the plans.

Nowhere do I see detailed plans for a case [e.g. wildfire] where the community needs to evacuate. There is already extremely limited egress from South University City, and especially after the reduction of vehicle access, there is no way the community could evacuate fully should the need arise. Though the plan addresses fire hazards, and touches on earthquake preparedness, it fails to address how help will be able to get into the area while residents struggle to evacuate from it. You will have created a death trap for the residents, which is woefully, egregiously reprehensible.

Sincerely,

Donna A. Koziol