ENVIRONMENTAL IMPACT REPORT

THE CITY OF SAN DIEGO

SUBJECT: Hillel Center for Jewish Life: SITE DEVELOPMENT PERMIT and a PUBLIC RIGHT-OF-WAY VACATION to allow the applicant to develop the Hillel Center for Jewish Life (HCJL) to provide religious programs for Jewish students at the University of California San Diego (UCSD), including meetings, one-on-one counseling, and administrative offices. Hillel currently uses a residential structure located at 8976 Cliffridge Avenue (Cliffridge property) to provide these religious programs. The vacant site is located at the southwest corner of the intersection of La Jolla Village Drive and La Jolla Scenic Way, which is just south of UCSD. Hillel has identified a need for additional space to improve services and provide a full range of religious programs in a centralized location for Jewish students at the UCSD campus (the project cannot be located on land owned by UCSD due to church and state separation issues). Hillel proposes to develop the HCJL in two phases to provide additional space for religious programs in three buildings around a central courtyard, referred to as the Phase 1/Phase 2 project throughout the Environmental Impact Report (EIR). Should the Phase 1/Phase 2 project not be approved by decision makers, an alternative to the project was also analyzed at full detail throughout the EIR. This alternative is referred to as the Existing with Improvements option. Under this alternative, the Cliffridge property that is currently being used by Hillel would be converted to permanent use. Both project proposals are described below: The project proposed is described as follows.

Phase 1/Phase 2 Project
Phase 1 would consist of the temporary use of the Cliffridge property as a space used for religious programs until the new HCJL facilities (Phase 2) are occupied. Additional temporary parking would be constructed, but no modifications would be required to the residential structure itself. Phase 2 would involve development of the 0.8-acre vacant parcel east of the Cliffridge property. The new facility would provide additional space for religious programs in three new buildings providing approximately 6,479 square feet of gross floor area (GFA) around a central outdoor courtyard. A surface parking lot would be constructed east of the courtyard and structures. Landscaping and pedestrian pathways would be provided throughout the permanent HCJL, including the existing cul-de-sac between the existing residential structure currently occupied by Hillel and the vacant parcel. Upon occupation of the new HCJL facilities, the temporary use of the Cliffridge property would expire and revert back to a single
dwelling unit use. A right-of-way vacation for a portion of the La Jolla Scenic Drive North is being requested. Phase 1/Phase 2 would also dedicate a 0.05-acre area along the northern property frontage to the public ROW. In addition, a deviation for driveway curb cut and parking requirements is being requested. The project has been designed to meet the standards required to obtain a Leadership in Energy and Environmental Design (LEED) Silver rating.

**Existing with Improvements Option**
An option is proposed in the event the Phase 1/Phase 2 project is not approved. Under this option, Hillel would not develop new facilities or provide landscaping as described above. Instead, Hillel would permanently use the Cliffridge property to provide for religious programs in the existing residential structure on a permanent basis. This would involve construction of permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the Municipal Code for this use. Modifications would be completed to the interior of the structure, parking would be provided at the rear of the property, and the existing architectural design would remain intact. Discretionary actions required to implement the Existing with Improvements Option include a SDP for development within the LJSPD. A deviation from the Maximum Paving and Hardscape in Residential Zones Requirement is also requested under the SDP to accommodate on-site parking.

The project site is bounded to the north by La Jolla Village Drive, to the east by La Jolla Scenic Way and to the south by La Jolla Scenic Drive. The project site is within a Single Family Zone of the La Jolla Shores Planned District, Coastal Height Limit Overlay Zone, Campus Parking Impact Overlay Zone, and the La Jolla Community Planning Area. (Legal Description: Lot 67 of La Jolla Highlands Unit No. 3, in the City of San Diego, County of San Diego, Parcel Map No. 3528 and Portion of Lot 1299, Miscellaneous Map 36, Pueblo Lands, in the City of San Diego, County of San Diego). Applicant: Hillel of San Diego.

**UPDATE:** March 24, 2017. Revisions and minor corrections, have been made to this document, in response to comments submitted, when compared to the draft Environmental Impact Report (EIR). Specifically, subsequent to circulation of the draft environmental document for public review, revisions have been incorporated into the final EIR to provide additional project clarification, related to Project Description, Land Use, Transportation/ Circulation/Parking, Greenhouse Gas, Hydrology, Water Quality analysis, and alternatives. Please refer to the attached Information Sheet for a brief overview of the revisions.

In accordance with the California Environmental Quality Act Section 15088.5, the addition of new information that clarifies, amplifies, or makes insignificant modifications and would not result in new impacts or no new mitigation does not require recirculation.
Pursuant to Section 15088.5(a) of the CEQA Guidelines: "Significant new information" requiring recirculation includes, for example, a disclosure or additional data or other information showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The modifications within the final environmental document do not affect the analysis or conclusions of the Environmental Impact Report. All revisions are shown in a strikethrough-and/or underline format.

BACKGROUND INFORMATION

This original project EIR was circulated for public review beginning October 31, 2012 and ending December 17, 2012. The City of San Diego, as the Lead Agency, identified the need to recirculate the original EIR from January 23, 2013 to March 11, 2013, because new information (historic structure documentation) was added after end of public review. The City identified the need to recirculate the EIR once again because new information has was been added after the Draft EIR was recirculated. The added This information is related to cumulative projects in the vicinity, construction traffic analysis, an updated biological survey, and on-site noise generation. No new significant impacts were identified as part of the revisions to the Draft EIR. The City, as Lead Agency, concluded that the proposed project modification represented a substantial change in the project and determined that the EIR should be revised and recirculated for public review, pursuant to Section 15088.5 of the CEQA Guidelines.

CONCLUSIONS

This EIR analyzes the environmental impacts that would result from the Phase 1/Phase 2 project and Existing with Improvements Option. The analysis discusses the project's potential impacts to Land Use, Transportation/ Circulation/Parking, Biological Resources, Geology and Soils, Energy Use and Conservation, Greenhouse Gases, Historical Resources, Noise, Paleontological Resources, Hydrology, Water Quality, and Visual Effects and Neighborhood Character.

The evaluation of environmental issue areas in this EIR concludes that the Phase 1/Phase 2 project would result in significant and mitigable direct impacts associated with Biological Resources
(sensitive biological resources), Noise (traffic noise exposure), and Paleontological Resources (unknown subsurface resources). The Existing with Improvements Option would result in significant and mitigable direct impacts associated with Noise (traffic noise exposure). Implementation of the proposed Mitigation Monitoring and Reporting Program would reduce these environmental effects to below a level of significance.

Neither the Phase 1/Phase 2 project nor the Existing with Improvements Option would not result in significant unmitigated impacts.

SIGNIFICANT MITIGATED IMPACTS

Phase 1/Phase 2 Project

Biological Resources (sensitive biological resources)

The Phase 1/Phase 2 project would potentially impact raptor and migratory bird nests. To ensure that no impacts to raptor nests or migratory birds would occur, raptor and migratory bird nesting mitigation (mitigation measure BIO-1) shall be implemented. If project grading is proposed during the raptor breeding season (February 1 – September 15), the project biologist shall conduct a pre-grading survey for active raptor nests within 300 feet of the development area. If active raptor or migratory bird nests are present, no grading or removal of habitat shall take place within 300 feet of an active raptor nest, and no active migratory bird nest shall be taken. Implementation of this proposed mitigation would reduce potential sensitive biological resources impacts to below a level of significance.

Noise (traffic noise)

Noise levels would exceed the City’s adopted interior noise limit of 45 CNEL at the vacant site associated with Phase 1/Phase 2. This would be a significant direct noise impact. To mitigate this impact, the applicant shall submit an interior acoustical analysis showing the interior 45 A-weighted decibels (dB(A)) residential noise level is achieved through building design measures (e.g., permanent window closure) prior to issuance of building permits (see mitigation measures NOS-1 and NOS-2). Implementation of this proposed mitigation would reduce potential noise exposure impacts to below a level of significance.

Paleontological Resources (unknown subsurface resources)

The project has the potential to result in significant impacts to paleontological resources, as the site is underlain by very old paralic deposits (previously included in the Lindavista Formation) and the Scripps Formation. Grading into these formations with high and moderate sensitivity for paleontological resources could potentially destroy fossil remains. This would be a significant impact. To mitigate this impact, paleontological monitoring during any earthwork shall be completed (see mitigation measure PALEO-1). The program would require that a qualified paleontological monitor be present during construction activities. If paleontological resources are discovered, excavation would temporarily stop to allow the paleontologist to record and recover materials.
Implementation of project mitigation would, therefore, mitigate potential impacts to a level below significance.

Existing with Improvements Option

Noise (traffic noise)

Noise levels would exceed the City’s adopted interior noise limit of 45 CNEL at the Cliffridge property associated with the Existing with Improvements Option. This would be a significant, direct noise impact. To mitigate this impact, the applicant shall submit an interior acoustical analysis showing the interior 45 dB(A) residential noise level is achieved through building design measures (e.g., permanent window closure) prior to issuance of building permits (see mitigation measures NOS-3 and NOS-4). Implementation of this proposed mitigation would reduce potential noise exposure impacts to below a level of significance.

ALTERNATIVES

No Project Alternative

Under the No Project Alternative, the Cliffridge house would revert to a single-family use. No new construction or changes to the building and/or building pad would occur. Another No Project Alternative pursuant to CEQA would be the continuation of the existing condition. Under this scenario, the Cliffridge property would continue to operate as a Hillel facility with the code violation removed. For this scenario, improvements would be required to bring the Cliffridge structure up to code to support the use. Under this alternative, significant but mitigated impacts associated with Biological Resources, Noise, and Paleontological Resources would not occur. However, The No Project Alternative would not meet any project objectives to provide a permanent religious space in a centralized location for Jewish students at UCSD; contribute to the longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses; provide a consolidated location with enough space for programs and activities and offices for religious leaders; enhance the pedestrian access, orientation, and walkability within the project site; or enhance the religious, spiritual, and community-building activities through the design and character of indoor and outdoor spaces. Furthermore, the No Project Alternative would not maximize use of land owned by the applicant or provide the enhanced pedestrian environment and inviting entrance to the community as compared to the Phase 1/Phase 2 project.

Under the No Project Alternative, existing conditions on the Cliffridge property and vacant site would be retained. Unlike Phase 1/Phase 2 or Existing with Improvements Option, no new improvements would occur. Should the No Project Alternative be implemented, the Phase 1/Phase 2 significant but mitigated impacts associated with Biological Resources, Noise, and Paleontological Resources would not occur. In addition, the mitigated noise impacts associated with Existing with Improvements Option would not occur. While adoption of the No Project Alternative would maintain the existing Cliffridge property and avoid impacts associated with Phase 1/Phase 2 and Existing with Improvements Option (as described throughout Chapter 4.0), none of the project objectives would be attained. Furthermore, the No Project Alternative would not maximize use of land owned by the applicant or provide the enhanced pedestrian environment and inviting entrance to the community.
as compared to the Phase 1/Phase 2 project. The No Project Alternative would not maximize use of land owned by the applicant that would occur under the Existing with Improvements Option.

**Existing with Improvements Option Alternative**

(Under this alternative, Hillel would permanently use the Cliffridge property to provide religious programs for Jewish students at UCSD including meetings, one-on-one counseling, and administrative offices. This would involve bringing the Cliffridge property up to all applicable code requirements for the intended religious use and occupancy and would include demolishing the existing attached garage, patio, and a tree in order to construct a paved surface parking lot. The programming offered at the permanent Cliffridge location would be of the same type as that proposed for the Phase 1/Phase 2 project, however, at a smaller scale. Permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the Municipal Code would be required for the permanent use. Modifications would be completed to the interior of the structure, but the existing architectural design would remain intact. Additional improvements to accommodate parking would be required. Discretionary actions required to implement the Existing with Improvements Alternative include a SDP for development within the LJSPD.

Under this alternative, significant but mitigated impacts associated with Biological Resources, and Paleontological Resources would not occur. Significant mitigated impacts associated with noise would be the same. However, while creating a permanent space for the Hillel facility, this alternative would not meet most of the project objectives. It would not provide adequate space to enhance community building activities through useable indoor and outdoor space. The Existing with Improvements Alternative would not enhance pedestrian and bicycle access in the neighborhood, and would not implement sustainable building goals.

Under this alternative, Hillel would not develop new facilities or provide landscaping as proposed under the project. Instead, Hillel would permanently use the Cliffridge property to provide for religious programs in the existing residential structure on a permanent basis. This would involve construction of permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the Municipal Code for this use. Modifications would be completed to the interior of the structure, parking would be provided at the rear of the property, and the existing architectural design would remain intact. Discretionary actions required to implement the Existing with Improvements Alternative Option include a SDP for development within the LJSPD. A deviation from the Maximum Paving and Hardscape in Residential Zones Requirement is also requested under the SDP to accommodate on-site parking.

**Reduced Project Footprint on Vacant Parcel Alternative**

The intention of the Reduced Project Footprint on Vacant Parcel Alternative is to decrease the on-site development footprint in order to reduce significant biological, noise, and paleontological impacts associated with the Phase 1/Phase 2 project. Under this alternative, the development footprint for new construction would be reduced to approximately 1.34 acres (a 33 percent reduction). This alternative would be 6,099 square feet of GFA (the Cliffridge house is 1,792 square feet of GFA; on the vacant site, one building would be 2,494 square feet of GFA without the second
floor, and the other would be 1,813 square feet of GFA). Compared to the Phase 1/Phase 2 project (6,479 square feet of GFA), this would represent a reduction of 380 square feet. By reducing the development footprint, this alternative would accommodate fewer people, which would reduce the parking demand, thereby requiring less surface parking than the Phase 1/Phase 2 project. The reduction in parking needed under this alternative would increase the amount of open space on-site and landscaping.

This alternative involves a permanent change of use permit to convert the Cliffridge property to permanent office use for Hillel and ensure that the property meets all applicable code requirements for the intended use and occupancy. Modifications to the structure would be to the interior, and the existing architectural design would remain intact. The Reduced Project Alternative would construct two one-story buildings on the adjacent 0.8-acre parcel similar in design and building materials as the existing residences in the area. As with the Phase 1/Phase 2 project, the cul-de-sac would be vacated and landscaped with native trees and shrubs to screen the property from the sidewalk and La Jolla Village Drive. In addition, the courtyard/inner yard area would be increased over the project and landscaped with native and drought-tolerant trees, shrubs, and groundcover. Parking improvements would be constructed in conformance with the Municipal Code and permit conditions.

This alternative would be expected to result in related incremental reductions to impacts related to energy, global climate change, noise, paleontological resources, hydrology, water quality, and visual effects/neighborhood character. This alternative would not meet all the objectives identified for the project, nor would it provide adequate space for the multiple functions needed to support the religious growth of UCSD students. The current Phase 1/Phase 2 project, at 6,479 square feet of GFA, has already been reduced in size from earlier plans, which provided approximately 13,000 square feet of GFA. The Phase 1/Phase 2 design reflects the size that has been determined to be the minimum space needed to support Jewish students at a university the size of UCSD. Therefore, a reduced footprint would not meet a critical project objective to provide space for religious programs proposed by Hillel.

Compared to the Phase 1/Phase 2 project, the Reduced Project Alternative would incrementally reduce impacts related to energy, global climate change, noise, paleontological resources, hydrology, water quality, and visual effects/neighborhood character. Significant impacts identified for both the Phase 1/Phase 2 project and the Reduced Project Alternative would be mitigated to below a level of significance.

While creating a permanent space for the Hillel facility, this alternative would not meet the major project objectives of providing adequate space for planned religious activities.

**Site 675 Alternative**

The intention of this alternative is to locate the proposed Hillel facilities on an alternate site—Site 675—the only vacant and available non-UCSD-owned site near the UCSD campus (the Phase 1/Phase 2 project cannot be located on land owned by UCSD due to church and state separation issues). The heavily sloping 13,400-square-foot property is located at the intersection of La Jolla Village Drive and Gilman Drive, surrounded by UCSD-owned land.
The Site 675 Alternative would construct three buildings similar in design and scale as those of the project. In addition, the courtyard/inner yard area would be similar to the project and landscaped with native and drought-tolerant trees, shrubs, and groundcover. Under this alternative, similar to Phase 1/Phase 2, the existing residential structure at 8976 Cliffridge Avenue would be returned to its original use pending development of a permanent facility for Hillel.

This alternative would result in greater physical impacts to the environment when compared to the Phase 1/Phase 2 project and the Existing with Improvements Option Alternative, including to biological resources, and paleontological resources. The Site 675 Alternative would meet all of the project's objectives.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The Existing with Improvements Option is an Alternative to the project that is being analyzed throughout the EIR, and would be considered the Environmentally Superior Alternative. The Existing with Improvements Option Alternative would incrementally reduce the Phase 1/Phase 2 less-than-significant impacts related to energy, global climate change, hydrology, water quality, and visual effects/neighborhood character. The Existing with Improvements Option Alternative would also reduce the Phase 1/Phase 2 significant and mitigated impacts associated with biological resources and paleontological resources. The Existing with Improvements Option Alternative would have the same significant but mitigated noise impact as the Phase 1/Phase 2.

The Existing with Improvements Option Alternative would not meet all of the project's objectives. This alternative would not provide a consolidated location with enough space for programs and activities and offices for religious leaders; would not enhance pedestrian access, orientation, and walkability of the area surrounding the project site; would not enhance the religious, spiritual, and community-building activities through the design and character of indoor and outdoor spaces; and would not implement the sustainable development goals through the installation of sustainable design features and building practices.

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the draft Environmental Impact Report and were invited to comment on its accuracy and sufficiency. Copies of the Environmental Impact Report, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the offices of the Development Services Department, or purchased for the cost of reproduction.

FEDERAL GOVERNMENT
U.S. Fish and Wildlife Service (23)

STATE OF CALIFORNIA
California Department of Fish and Game, Don Chadwick (32)
Department of Toxic Substance Control (39)
California Regional Water Quality Control Board (44)
State Clearinghouse (46A) [15 CDs + 15 Executive Summaries]
STATE OF CALIFORNIA - CONTINUED
California Transportation Commission (51)
California Department of Transportation (51A)
California Department of Transportation (51B)
Native American Heritage Commission (56)

CITY OF SAN DIEGO
Mayor's Office (91)
Councilmember Bry, District 1 (MS 10A)
Councilmember Zapf, District 2 (MS 10A)
Councilmember Ward, District 3 (MS 10A)
Councilmember Cole, District 4 (MS 10A)
Councilmember Kersey, District 5 (MS 10A)
Councilmember Cate, District 6 (MS 10A)
Councilmember Sherman, District 7 (MS 10A)
Councilmember Alvarez, District 8 (MS 10A)
Councilmember Gomez, District 9 (MS 10A)
Development Services
   EAS - Shearer
   Transportation Development – E Alberto
   Engineering – J Tamaras
   Fire – R Carter
   Planning Review – B Church
   Landscape – B Church
   Map Check – J Taylor
   PUD Wastewater/Water – K Mahmood
   Geology – J Quinn
   Long-Range Planning – L Henegar
   DPM – W Zounes
Transportation Development (78)
Development Coordination (78A)
Fire and Life Safety Services (79)
San Diego Fire – Rescue Department Logistics (80)
Library, Government Documents (81)
Central Library (81A)
La Jolla/Ridford Branch Library (81L)
Historical Resources Board (87)
Environmental Services Department (93A)
Facilities Financing (93B)
City Attorney's Office (MS 93C)

OTHER INTERESTED AGENCIES, ORGANIZATIONS AND INDIVIDUALS
Sierra Club (165)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
Mr. Jim Peugh (167A)
California Native Plant Society (170)
Endangered Habitats League (182A)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Clint Linton (215B)
Frank Brown, Inter-Tribal Cultural Resources Council (216)
San Diego County Archaeological Society, Inc. (218)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Distribution [Notice and Site Plan Only] (225A-5)
La Jolla Village News (271)
La Jolla Shores Association (272)
La Jolla Town Council (273)
La Jolla Historical Society (274)
La Jolla Community Planning Association (275)
Milton Phegley, UCSD (277)
La Jolla Shores PDO Advisory Board (279)
La Jolla Light (280)
Patricia K. Miller (283)
Carmel Mountain Conservancy (284)
Robert Barto
Ross M. Starr, Ph.D.
Jim Fitzgerald
Nancy D. Marro
Patricia Granger
Joe LaCava
Tom Brady
Julie Hamilton
Maria Rothschild
Vaughn Woods
Dave Schwab, La Jolla Light Newspaper
Tim Lucas
Gale Spicher
Michael Costello
Leslie Lucas
Helen Boyden
Sally Miller
Michele Addington
Oliver W. Jones, M.D., President, Taxpayers for Responsible Land Use
Richard Attiyeh
Annette Villalobos
David Diamond
Jackie Diamond
Ted and Jonnie Frankel
OTHER INTERESTED AGENCIES, ORGANIZATIONS AND INDIVIDUALS - CONTINUED

Executive Asst. to Rabbi Jeff, Elulite
Laurette Verbinski
John A. Berol
Scott Noya
W. W. Finley
Rita T. O'Neil
Donald Wolochow, MD
Mary Mosson
Judy Shufro
Joan Rice
Joel Bengston
James Mittermiller
Nancy Anne Manno
Irene Kuster McCann
Sue Moore
Dave
Joe Bakston
James Friedman
Rincon Band of Luiseno Indians
Edward Oleata
Daniel T. Allen
M. and J. Chrispeels
Paula B. Jones
Louis Alpinieri
Jessica F. Attiyeh
Neha Bahadur
Jeffrey Broido
Andrea Dahlberg
Gail Forbes
Otila Gallegos
Jamye Krawiec
The Kusters
Larson-Kuster
Serafim Masouredis
The McCanns
Mary Mosson
Walter H. Munk and Mary Coakley Munk
Charles Perrin
K. Rebeiz
Elaine Roberts (Tanaka)
F. Akif Tezcan, Ph.D.
Alexander Varon
Roger Wiggans
Beverly Douglas
Max
Rincon Band of Luiseno Indians
RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.

(X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the Environmental Impact Report, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the offices of the Development Services Department, or purchased for the cost of reproduction.

Kerry M. Santoro
Deputy Director
Development Services Department

Analyst: Shearer-Nguyen
All of the following revisions have been made into the Final EIR to provide additional project clarification. The following provides a brief discussion of the areas that have been modified.

- Formatting of the analysis of the Existing with Improvements Alternative. Specifically, the previously circulated EIR included the analysis of the Existing with Improvements Alternative throughout the body of the EIR. In order to clarify that the Phase 1/Phase 2 proposal is the project proposed for approval by the decision makers, all discussions and analysis related to the Existing with Improvements Alternative have been compiled into Chapter 9.0 (Project Alternatives) of the Final EIR. This alternative was already included within Chapter 9.0; however, all additional details contained throughout the sections of Chapter 4.0 have been added verbatim to the alternatives analysis.

- Clarification of discretionary actions. The project description has been updated to reflect that the Site Development Plan would include a request for a deviation from minimum parking requirements. Although the Phase 1/Phase 2 project would be used for religious purposes, it does not fit into a specific category as defined in the Municipal Code for parking regulations. For example, Table 142-05G of the City Municipal Code identifies the applicable regulations associated with required parking based on parking ratios for specified non-residential uses. As discussed in greater detail in Sections 4.1.3.1 and 4.2.4.1, the proposed deviation would provide a total of 27 parking spaces.

- Clarification of project operations. The project description has been updated related to the project's anticipated special events and total occupancy issues. Specifically, the text has been clarified to state that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year, occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code. On occasions where attendance could be greater than 100 persons, a Parking Management Plan would be implemented.

- Updated greenhouse gas analysis. Since the previous public review circulation, the City has instituted a new process for the determination of a project's compliance with the newly adopted Climate Action Plan (CAP). Specifically, Section 4.6 has been updated to reflect the project's consistency with the City's CAP Checklist designed to detail the project's proposed implementation of design measures aimed at reduction of GHG emissions.

- Updated Hydrology and Water Quality chapters (Sections 4.10 and 4.11, respectively). Since the previous public review circulation, the City updated their water management regulations. Specifically, the San Diego Municipal Code was amended to include new Storm Water Runoff and Drainage Regulations (SDMC Chapter 14, Art. 2, Div. 2). In addition, the City adopted its new Drainage Design Manual and Storm Water Standards Manual.
• A Transportation Demand and Parking Management Plan (TDPMP) has been prepared for the project (see Appendix B-2). The TDPMP provides a plan to alleviate potential parking issues arising from special events at the facility.

All revisions, are shown in strikeout/underline format throughout the body of the Final EIR. The changes are summarized below:

Executive Summary
• A brief summary of the Existing with Improvements Alternative has been added to Section S.5.1.
• Table S-1 has been revised to remove mitigation associated with the Existing with Improvements scenario. This is discussed in Chapter 9.0 of the Final EIR.

Project Description
• Section 3.3 has been revised to clarify the deviations required for approval of the SDP.
• Section 3.4.2.1a has been revised to clarify anticipated special events, requirement for a Parking Management Plan, and occupancy issues.
• Section 3.4.2.1 has been revised to reference the language of the TDPMP.
• Section 3.4.2.1 has been revised to explain the requirement for the parking deviation request.
• Section 3.5 has been updated to reflect the project's consistency with its CAP Checklist (see above).

Land Use
• Section 4.1.3.1 has been revised to add an analysis associated with the deviation from parking requirements.

Traffic
• Section 4.2.4.1 has been revised to add further explanation and clarification related to the event attendance survey providing further support for the proposed 27 on-site parking spaces.

Greenhouse Gas
• As discussed above, Section 4.6 has been revised to replace the previous analysis and includes a discussion of impacts under a threshold of significance related to the City's CAP and the project's consistency with the CAP Checklist.

Hydrology
• As discussed above, Section 4.10 has been revised to replace the previous analysis and includes a discussion of impacts related to the City's new water management regulations.

Water Quality
• As discussed above, Section 4.11 has been revised to replace the previous analysis and includes a discussion of impacts related to the City's new water management regulations.

Chapters 12.0 and 13.0 have been consolidated to allow ease of review.
The following Appendices have also been revised to provide further clarification of issues and support for Final EIR conclusions.

Appendix B: Traffic Impact Analysis
- Chapter 15 of Appendix B was updated to add further explanation and clarification related to the event attendance survey providing further support for the proposed 27 on-site parking spaces.
- The TDPMP has been added as Appendix B-2.

Appendix C: Biological Letter Report
- An additional site visit occurred on July 26, 2016 to verify the conditions of the biological report. The results are included in Appendix C-2.

Appendix E: Greenhouse Gas
- Appendix E has been replaced with the project’s CAP Checklist.

Appendix I: Drainage Study
- Appendix I has been replaced with an updated study prepared by Atlas design, dated 2016.

Appendix H: Storm Water Maintenance and Management Plan
- Appendix H has been replaced with an updated study prepared by Atlas design, dated 2016.
HILLEL CENTER FOR JEWISH LIFE

Letters of Comment and Responses

Letters of comment to the Draft EIR were received from the following agencies, organizations, and individuals. Several comment letters received during the Draft EIR public review period contained accepted revisions that resulted in changes to the final EIR text. These changes to the text are indicated by strike-out (deleted) and underline (inserted) markings. The letters of comment and responses follow.

FIRST PUBLIC REVIEW DRAFT (Released October 2012)

Agencies and Organizations
A State Clearinghouse and Planning Unit ................................................................. RTC-4
B Department of Toxic Substances Control ............................................................. RTC-6
C Native American Heritage Commission ............................................................... RTC-8
D Rincon Band of Luiseno Indians ........................................................................... RTC-14
E San Diego Archaeological Society ....................................................................... RTC-15

Individuals
F Berol, John A. (November 3, 2012) ................................................................. RTC-16
G Berol, John A. (December 6, 2012) ................................................................. RTC-18
H Oleata, Edward ......................................................................................... RTC-22
I Starr, Ross M. ......................................................................................... RTC-24

SECOND PUBLIC REVIEW DRAFT (Recirculated January 2013)

Agencies and Organizations
J Native American Heritage Commission ............................................................... RTC-33
K La Jolla Community Planning Association ....................................................... RTC-39

Individuals
L Allen, Daniel T. ........................................................................................ RTC-76
M Alpinieri, Louis ......................................................................................... RTC-79
N Attiyeh, Jessica ......................................................................................... RTC-80
O Attiyeh, Richard ....................................................................................... RTC-100
P Bahadur, Neha ......................................................................................... RTC-108
Q Berol, John .................................................................................................. RTC-114
R Boyden, Helen ........................................................................................ RTC-117
S Broido, Jeffrey ........................................................................................ RTC-121
T Chrispeels, Maarten and Janet ................................................................ RTC-122
**Individuals (cont.)**

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**THIRD PUBLIC REVIEW DRAFT (Recirculated December 2013)**

**Agencies and Organizations**

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**Individuals**

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<td>Varon, Alexander</td>
<td>RTC-862</td>
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The comment acknowledges that the EIR complied with the State Clearinghouse review requirements pursuant to CEQA. No further response is required.
Document Details Report
State Clearinghouse Data Base

SG# 2010110020
Project Title: UCSD Hillel Center for Jewish Life (also Hillel Student Center of San Diego)
Lead Agency: San Diego, City of
Type: EIR
EIR

Description: The project applicant, Hillel, is organized as a 501(c)(3) CA nonprofit religious organization. Hillel currently uses the residential structure at 901 College Avenue (Dillard property) for administrative offices, one-on-one counseling, and meetings with participants. Permanent use of the facility would require improvements to increase usable parking. In addition, Hillel has identified a need for additional space to improve services and provide a full range of religious programs.

Phase 1: Phase 2: To meet the identified objectives and need, Hillel proposes a two-phase project consisting of temporary permitting and minor changes to existing facilities and development of a new permanent facility, the HCC. The combined phases comprise the project and are referred to as Phase 1/Phase 2 in the EIR.

Lead Agency Contact
Name: Elizabeth Swedberg
Agency: City of San Diego
Phone: (619) 534-6536
Fax:
Address: 222 First Avenue, MS 501
City: San Diego
State: CA
Zip: 92101

Project Location
County: San Diego
City: La Jolla
Region:
Lat/Long: 32.869050’ N, 117.242048’ W
Grass Street: College Avenue
Parcel No.:
Township:
Section:
Range:
Base:

Proximity to:
Schools:
Aquifers:
Highways:
Waterways:

Land Use:
Biological Resources:
Disasters/Disasters:
Geological/Seismic:
Noise:
Traffic/Circulation:
Vegetation:
Water Quality:
Wildlife/Landscapes:

Resource Agencies:
Department of Fish and Wildlife, Region 7; Office of Natural Heritage;
Department of Parks and Recreations/Department of Water Resources; Coastline Highway Patrol;
Conservation District of San Diego; Regional Water Quality Control Board; Region II; Department of Trade;
Supporting Cultural; Native American Heritage Commission

Data Received: 10/03/2012 Start of Review: 11/21/2012 End of Review: 12/14/2012
B-1 The comment provides factual background information. No further response is required.

B-2 The DTSC’s comments on the NOP were received and were included in Appendix A to the EIR and also are attached as part of the Final EIR. The DTSC requested that a search of the databases of regulatory agencies be conducted, which keep track of known hazardous material sites.

Chapter 8 of the EIR includes analysis of topics found to be not significant, including Hazards and Hazardous Materials. A regulatory database search was conducted and no hazardous material sites were found on the project site (or within ¼ mile of the project site). The Final EIR has been clarified regarding this issue.
LETTER

Ms. Elizabeth Shearer-Nguyen
December 11, 2012
Page 2

2) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbas, DTSC’s Voluntary Cleanup Coordinator, at (714) 484-5489.

If you have any questions regarding this letter, please contact Rafig Ahmed, Project Manager, at rahmed@dtsc.ca.gov, or by phone at (714) 484-5491.

Sincerely,

Rafig Ahmed
Project Manager
Brownfields and Environmental Restoration Program

cc: Governor’s Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@bpr.ca.gov

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 308
Sacramento, California 95812
Attn: Nancy Ritter
ritter@dtsc.ca.gov

CEQA # 3075

RESPONSE

B-3 Comment noted. No further response is required.
C-1 Comment noted. No further response is required.

C-2 The comment provides reference to CEQA with respect to cultural and archaeological resources.

With respect to the requirements of CEQA, the City of San Diego required that a Cultural Resources Report (2010) be prepared for the Phase 1/Phase 2 project. The report is included as Appendix F-1 to the EIR. As discussed in Section 4.7.4.1(a) of the EIR, based on this report, along with adherence to state and local regulatory requirements, it was concluded that the project would result in less than significant impacts to historical or cultural resources.

C-3 The City requested a Sacred Lands File search, which was conducted by the Native American Heritage Commission. The search did not reveal any prerecorded Native American cultural resources in the immediate project area. An archaeological resources survey was conducted with a representative of the Kumeyaay Nation, Clint Linton of Red Tail Monitoring and Research, Inc. accompanying. No significant archaeological resources were identified within the project area.
C-4 The project is not subject to NEPA, as the project is not located on federal land nor is federal funding involved. Thus, the project is not subject to the regulations stated within this comment.

C-5 Please refer to the response to comment C-3. The Cultural Resources Report was submitted to and approved by the City of San Diego Environmental Analysis Section. The City of San Diego recognizes the confidential nature of the NAHC Sacred Lands Inventory as well as the locations of all types of archaeological and Native American sites within our jurisdictional boundaries. All archaeological site information obtained as a result of evaluating the potential for cultural resources is included in a separate confidential appendix to the Cultural Resources Report which was not made available to the public with distribution of the EIR.

C-6 As detailed in Section 4.7.4.1(a) of the EIR, in the unlikely event of the discovery of human remains during project grading, all contractor and City staff are required to adhere to California Health and Safety Code Section 7050.5. This section of the Health and Safety Code requires no further disturbance to occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. With implementation of these procedures, impacts to cultural resources would be less than significant.
Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends "avoidance" of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 953-6251.

Sincerely,

[Signature]

Dwye Seibel
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List
Native American Contacts
San Diego County
November 7, 2012

Berona Group of the Capitan Grande
Edwin Romero, Chairperson
1065 Barona Road
Lake Elsinore, CA 92530
sue@berona-rsn.gov
(619) 443-0612
619-443-0611

La Posta Band of Mission Indians
Gwenldori Parada, Chairperson
PO Box 1120
Boulevard, CA 92005
gp@lapostacasino.com
(619) 478-2121
619-478-2122

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 385
Valley Center, CA 92082
diego@sanpasqualband.com
(760) 749-3200
(760) 749-3878 Fax

Sycuan Band of the Kumeyaay Nation
Daniel Tucker, Chairperson
5459 Sycuan Road
El Cajon, CA 92019
sycuan@dytnsn.gov
619 445-2613
619 445-1827 Fax

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
PO Box 908
Alpino, CA 91903
jpico@viejas-rsn.gov
(619) 445-3810
(619) 445-3337 Fax

Kumeyaay Cultural Historic Committee
Ron C. Christiansen
55 Viejas Grade Road
Alpine, CA 92001
(619) 445-0385

Cahuilla Band of Indians
Ray Glazier, Chairperson
1085 Slice Road
Green Valley, CA 92228
glazier@cahuilla.com
(760) 291-6674
(760) 291-6675 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Sections 70405.5 of the Health and Safety Code, Section 657.04 of the Public Resources Code and Section 5037.38 of the Public Resource Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed 5D012395(0345P) PEDD Notice of Determination draft Environmental Impact Report (EIR) for the USIP High Center at Javelina Ute Project located at the University of California, San Diego, City of San Diego, San Diego County, California.
LETTER

Native American Contacts
San Diego County
November 7, 2012

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270
San Diego, CA 92070
mesagrandetriband@msn.com
(760) 782-3818
(760) 782-9092 Fax

San Pasqual Band of Indians
Krisie Crosson, Environmental Coordinator
P.O. Box 365
Valleymar, CA 92082
(760) 749-3200
council@sanpasqualtribe.org
(760) 749-3876 Fax

Kwaaymil Laguna Band of Mission Indians
Gorman Lucas
P.O. Box 775
Pine Valley, CA 91962
(619) 709-4607

Ewisaapaay Tribal Office
Will Micklin, Executive Director
4054 Willows Road
Diegueno/Kumeyaay
Alpine, CA 92025
wmicklin@leavinggrock.net
(619) 445-6315 - voice
(619) 445-9125 - fax

Inaja Band of Mission Indians
Rebecca Osuna, Chairman
2005 S. Escondido Blvd.
Escondido, CA 92025
(760) 737-7628
(760) 747-8588 Fax

Ewisaapaay Tribal Office
Michael Garcia, Vice Chairperson
4054 Willows Road
Diegueno/Kumeyaay
Alpine, CA 92025
michaelg@grocks.com
(619) 445-6315 - voice
(619) 445-9125 - fax

Kumeyaay Cultural Repatriation Committee
Steve Santayas, Spokesperson
1095 Bercone Road
Diegueno/Kumeyaay
Lakeside, CA 92040
santayas65@gmail.com
(619) 742-5587
(619) 445-0681 FAX

Ipai Nation of Santa Ysabel
Curt Lintron, Director of Cultural Resources
P.O. Box 507
Diegueno/Kumeyaay
Santa Ysabel, CA 92070
clinton73@aol.com
(760) 803-5694
cclinton73@aol.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibilities as defined in Section 650.6 of the Health and Safety Code, Section 6507.24 of the Public Resources Code and Section 6507.69 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed 6240010/10600 SRSM Notice of Determination draft Environmental Impact Report/Environmental Impact Statement for the UCSD Health Center of Jewish Life Project, located at the University of California, San Diego, City of San Diego, San Diego County, California.
LETTER

Native American Contract
San Diego County
November 7, 2012

Manzanita Band of the Kumeyaay Nation
Larry J. Elliott, Chairperson
P.O. Box 1302
Boulevard, CA 92015
(619) 766-4830 - Office
(619) 766-4850 - FAX

Kumeyaay Diegua Land Conservancy
Mr. Kim Bactad, Executive Director
2 Kwaaaylaay Courth
El Cañon, CA 91919
(619) 445-2238 - Fax
kwbactad@yahoo.com

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road
Alpine, CA 91901
(619) 853-1088 - Office
kwbactad@gmail.com

Kumeyaay Cultural Repatriation Committee
Bernice Pape, Vice Spokesperson
1095 Barona Road
Lakeview, CA 92040
(619) 478-2113

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7105.5 of the Health and Safety Code, Section 5017.34 of the Public Resources Code, and Section 5017.35 of the Public Resources Code.

This list is applicable for controlling local Native Americans with regard to cultural resources for the proposed
CP-06472-2019-1.BEA Notice of Completion: Direct Environmental Impact Report (DEIR) for the UCSD Inter-Center of Access Life Project, located on the campus of the University of California, San Diego, City of San Diego, San Diego County, California.
D-1 With respect to potential impacts to historical and cultural resources, the City of San Diego required that a Cultural Resources Report (2010) be prepared for the Phase 1/Phase 2 project. This report was included as Appendix F-1 to the EIR. As discussed in Section 4.7 of the EIR, based on this report, along with adherence to state and local regulatory requirements, it was concluded that the project would result in less than significant impacts to historical and cultural resources. Therefore, no monitoring for cultural resources would be required.

D-2 A Sacred Lands File search was conducted by the Native American Heritage Commission and did not reveal any prerecorded Native American cultural resources in the immediate project area. An archaeological resources survey was conducted with a representative of the Kumeyaay Nation, Clint Linton of Red Tail Monitoring and Research, Inc. accompanying. No significant archaeological resources were identified within the project area.

The City acknowledges the updated contact information.
The comment concurs with the conclusion of the EIR that no significant impacts to cultural resources would occur. No further response is required.
Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose "...is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

With respect to noise, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m., and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. Section 4.8.3.1(a) of the EIR explains that on-site noise sources from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.
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<th>LETTER</th>
<th>RESPONSE</th>
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<td></td>
<td>F-2</td>
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<td>Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.</td>
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<td>While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.</td>
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G-2 Please refer to response to comment G-1.
G-3 Furthermore, all the Municipal Code’s parking regulations for religious facilities are stated for “Churches & Places of Religious Assembly.” The DEIR authors dismiss those requirements by saying “There are no specific parking regulations for the proposed use of Phase 2 of the HCL in the City’s Municipal Code” (DEIR 3-20), apparently because they do not view the project as that kind of religious facility. But then it is not the kind of facility which the Code permits in the first place within the La Jolla Shores PDO Single Family Zone.

G-4 There is good reason for what the Code does permit. Houses of worship in a residential Single Family Zone offer religious services to all residents without regard to their university affiliation. In contrast, an institutional UCSD student center would serve only UCSD students to the exclusion of everyone else. That would not be a good fit for a residential zone.

Sincerely,

John A. Berol

G-3 Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces.
Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

The Phase 1/Phase 2 project is not a “student center” as the commenter uses the term. See response to comment G-1 regarding the project’s primary religious use. The remainder of the comment expresses the opinions of the commenter and does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. Therefore, no further response is required.
The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) states that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined in be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:
The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.

H-3 This comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. Therefore, no further response on this issue is required.
Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose "...is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

The project represents a religious use which, like other churches, temples, and places of worship, would inherently include some accessory uses, which are considered part of the primary use. As detailed in Section 3.4.2 of the EIR, the proposed project would include multiple component parts which support the primary use of project (see response to comment I-1). Besides the library/chapel, religious activities would take place in the lounge and meeting rooms, as well as the outdoor courtyard space. The kitchen would be used to prepare traditional meals during religious holidays. Bathrooms are necessary for religious staff members and visitors. A shower is necessary to encourage bicycling to the site and a commonplace within facilities of this nature.

As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.
The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor.
area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
I-4 (cont.)

With respect to the provision of parking based on the square feet of the proposed structure, see response to comment I-3 for a discussion of the allowable occupancy of the facility. As described above, the project is providing adequate parking for its intended use.

I-5

Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.
The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact. With respect to the reduction in on-street parking, The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces. Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

With respect to the use of the project site as “open space,” in November 2000, Site 653 was evaluated for potential incorporation into the City’s Park and Recreation Department's open space inventory. As detailed in a City memo from the Director of the Park and Recreation Department (McLatchy 2000), the parcel did not
I-6c (cont.)
meet the City’s definition as an open space parcel, as it is "completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value." See EIR Section 3.6.1.

I-6d  See response to comment I-6b.

I-7  See response to comment I-6b.

I-8  See response to comment I-1.
There is no such requirement and the commenter does not provide evidence of such requirement. The project site is owned by Hillel.

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.
Appendix 1: Hillel of San Diego Description and Mission Statement (from http://www.hillel.org/about/ November 3, 2012)

About

Hillel of San Diego, accredited by Hillel: The Foundation for Jewish Campus Life, serves an estimated 5000 Jewish undergraduate and graduate students at institutions of higher education across San Diego County. Students from all backgrounds are invited to participate in Jewish life on campus. Social, cultural, educational, and community service programs provide opportunities for students to build relationships with each other and develop Jewish community.

Hillel of San Diego Mission Statement

To be a vibrant Jewish campus presence and to involve the maximum number of university-age Jews in ways that foster a lasting commitment to Jewish life.

To further this mission, we commit ourselves to the following goals:

- Serving the needs of individual Jewish students
- Creatively engaging and empowering Jewish students through personal interactions and compelling programs
- Building a strong sense of belonging and Jewish identity
- Nurturing intellectual and spiritual growth in a pluralistic community
- Advocating for Jewish student needs on campus and in the community
- Linking the campus community to the larger Jewish community, locally and globally
- Helping students cultivate a closer connection to Israel
- Developing a campus and organizational culture in which the quality of the relationships attracts involvement.
Appendix 2: La Jolla Scenic Dr. with blind intersections at La Jolla Scenic Way and at Clifford Ave. --- a traffic hazard with a narrowed street.
J-1 This comment is an introduction to comments that follow. No further response is required.

J-2 The comment provides reference to CEQA with respect to cultural and archeological resources.

With respect to the requirements of CEQA, the City of San Diego required that a Cultural Resources Report (2010) be prepared for the Phase 1/Phase 2 project. The report is included as Appendix F-1 to the EIR. As discussed in Section 4.7.4.1(a) of the EIR, based on this report, it was concluded that the project would result in less than significant impacts to historical or cultural resources.

J-3 The City requested a Sacred Lands File search which was conducted by the Native American Heritage Commission. The search did not reveal any prerecorded Native American cultural resources in the immediate project area. An archaeological resources survey was conducted with a representative of the Kumeyaay Nation, Clint Linton of Red Tail Monitoring and Research, Inc. accompanying. No significant archaeological resources were identified within the project area.
LETTER

significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends avoidance as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and California Public Resources Code Section 21083.2 (Archaeological Resources) that requires documentation, data recovery of cultural resources, construction to avoid sites and the possible use of covenant easements to protect sites.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-4335). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 et seq). 36 CFR Part 800.3 (f) (2) & 8.5, the President's Council on Environmental Quality (CSQ, 42 U.S.C. 4371 et seq. and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 Secretary of the Interior Standards for the Treatment of Historic Properties were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11592 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior’s Standards include recommendations for all ‘lead agencies’ to consider the historic context of proposed projects and to “research” the cultural landscape that might include the ‘area of potential effect.’

Confidentiality of ‘historic properties of religious and cultural significance’ should also be considered as protected by California Government Code §52541 (f) and may also be protected under Section 304 of the NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C. 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.88, California Government Code §27461 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a ‘dedicated cemetery.’

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends ‘avoidance’ of the site as referenced by CEQA Guidelines Section 15370(a).

RESPONSE

The project is not subject to NEPA, as the project is not located on federal land nor is federal funding involved. Thus, the project is not subject to the regulations stated within this comment.

Please refer to the response to comment J-3. The Cultural Resources Report was submitted to and approved by the City of San Diego Environmental Analysis Section. The City of San Diego recognizes the confidential nature of the NAHC Sacred Lands Inventory as well as the locations of all types of archaeological and Native American sites within our jurisdictional boundaries. All archaeological site information obtained as a result of evaluating the potential for cultural resources is included in a separate confidential appendix to the Cultural Resources Report, which was not made available to the public with distribution of the EIR.

As detailed in Section 4.7.4.1(a) of the EIR, in the unlikely event of the discovery of human remains during project grading, all contractor and City staff are required to adhere to California Health and Safety Code Section 7050.5. This section of the Health and Safety Code requires no further disturbance to occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. With implementation of these procedures, impacts to cultural resources would be less than significant.
If you have any questions about this response to your request, please do not hesitate to contact me at (916) 553-8251.

Sincerely,

Darek Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List
LETTER

Native American Contacts
San Diego County
January 24, 2013

Mesa Grande Band of Mission Indians
Mark Romano, Chairperson
P.O. Box 270
Diegueno-
Santa Ysabel, CA 92070
(760) 732-3818
(760) 782-3818 Fax
megasgrandepend@msn.com

Ewiqaapaayp, Tribal Office
Will Micklin, Executive Director
4054 Willets Road
Diegueno/Kumeyaay
Alpine, CA 92009
wmicklin@farmingtools.net
(619) 445-615 - voice
(619) 445-8126 - fax

Iipay Nation of Santa Ysabel
Chief Linton, Director of Cultural Resources
P.O. Box 507
Diegueno/Kumeyaay
Santa Ysabel, CA 92070
klinton73@aol.com
(760) 803-6694
(760) 803-6694

Ipai Band of Mission Indians
Carmen Lucas
P.O. Box 775
Diegueno-
Pine Valley, CA 91962
(619) 708-4207

Kwaaymii Band of Mission Indians
Rebecca Osuna, Chairman
2005 S. Escondido Blvd.
Diegueno-
Escondido, CA 92025
(760) 737-7928
(760) 747-8588 Fax

Manzanita Band of the Kumeyaay Nation
Leroy J. Elliott, Chairperson
P.O. Box 1302
Diegueno/Kumeyaay
Bellevue, CA 91905
bjevers@verizon.net
(619) 768-4930
(619) 768-4567 - FAX

Kumeyaay Cultural Repatriation Committee
Steve Benegas, Spokesperson
1065 Barona Road
Diegueno/Kumeyaay
Lakeside, CA 92034
sbenegas50@gmail.com
(619) 742-5587
(619) 443-0881 FAX

Kumeyaay Diegueno Land Conservancy
Mr. Kim Bectad, Executive Director
2 Kwawpyapaay Court
Diegueno/Kumeyaay
El Cajon, CA 92019
guidesoffice@verizon.com
(619) 445-0298 - FAX
(619) 659-1008 - Office
kimbaclad@gmail.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7669.6 of the Health and Safety Code, Section 6009.4 of the Public Resources Code and Section 5037.6 of the Public Resources Code.

This list is compiled for submitting local Native American with regard to cultural resources for the report

MCHB31061031; CDSA Notice of Completion; Re-Circulated Draft Environmental Impact Report (EIR) for the USD Jewish Center for Jewish Life Projects located in the La Jolla Community North area of the City of San Diego, San Diego County, California.

RESPONSE
Native American Contacts
San Diego County
January 24, 2013

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator
240 Brown Road, Diegueno/Kumeyaay
Alpine, CA 91901
frankbrown6288@gmail.com
(619) 884-5487

Kumeyaay Cultural Repatriation Committee
Birincia Pepe, Vice Spokesperson
1905 Benona Road, Diegueno/Kumeyaay
Lakeside, CA 92030
(619) 478-2113
(KCRC) is a coalition of 12 Kumeyaay Governments.

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7055.5 of the Health and Safety Code, Section 6189.94 of the Public Resources Code, and Section 6697.94 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed Project #4491610430: CEQA Notice of Determination, Re-Circulated Draft Environmental Impact Report (DEIR) for the USDG Wind Center for Jewish Life Project, located in the La Jolla Community Plan area of the City of San Diego, San Diego County, California.
La Jolla Community Planning Association

To:        E. Shewer-Nguyen, Environmental Planner
           City of San Diego, Development Services Department Center

From:      Tony Cirisiti, President, La Jolla Community Planning Association

Subject:   LJCPA Comments on the Draft Environmental Impact Report for the UCSD
           Hilltop Center for Jewish Life

Project:   # 212993/ SCH # 2010101030

Date:      March 11, 2013

The attached is a summary of the comments and actions taken by the La Jolla Community Planning Association at its March 7, 2013 meeting related to the DEIR for UCSD Center for Jewish Life. What follows is the Motion of the organization, with the referenced documents.
For purposes of clarity, to facilitate responses on the items of concern, overlined, underlined &
underscored numbers were inserted for each comment in order to distinguish these numbers from
the original text.

Sincerely,

Tony Cirisiti, President
La Jolla Community Planning Association

PO Box 389, La Jolla, CA 92038 • 619.566.3900 • http://www.lajollaCPA.org • info@lajollaCPA.org

RTC-39
La Jolla Community Planning Association (LJCPA)

Motion:
regarding the Hillel Draft Environmental Impact Report (DEIR):

That the Hillel Draft Environmental Impact Report (DEIR) is deficient and contains major
errors and omissions regarding: 1) the proposed Hillel project’s immediate and cumulative
impacts on the surrounding neighborhood; and 2) the project’s substantial, precedent-
setting non-compliance with the La Jolla Shores PDO, the Municipal Code, and the La
Jolla Community Plan. The LJCPA adopts the findings and conclusions of the Ad Hoc
Committee. Minutes and three attached letters. These deficiencies are documented in the
attachments to this motion and include, but are not limited to the DEIR:

A. Ignoring that a student center is not an allowed use in a residential neighborhood.
B. Ignoring the La Jolla and City-wide precedent that would be set by allowing a
student center in a residential neighborhood—e.g., UCSD’s website currently
recognizes 60 spiritual student organizations on campus.
C. Failing to consider possible alternative sites close to UCSD where the zoning would
permit a student center.
D. Failing to consider the impact of the soon-to-be-open Venter Institute in assessing
the project’s traffic impact—in fact, the new Venter Institute is not even mentioned
in the DEIR.
E. Failing to point out the lack of required on-site parking spaces for Hillel’s stated use
for the project (i.e., a place of religious assembly) as well as failing to substantively
address the associated loss of on-street parking in a Parking Impact Overlay Zone.
F. Failing to provide findings to support the requested vacation of a public right-of-
way.
G. Failure to adequately consider the visual/community-character impacts of the
proposed student center project on the surrounding residential homes and
neighborhood, including: a) setbacks, b) bulk and scale, c) intensity of use, d) noise.

Attachments:

- Minutes of the LJCPA Ad Hoc Committee, which reviewed the Hillel DEIR.
- Phil Merten letter to the Ad Hoc Committee, dated 2/27/13, regarding the Hillel
DEIR
- Ross M. Starr, Ph.D. letter to City of San Diego Development Services Department,
dated 1/30/13, regarding the Hillel Center for Jewish Life (submitted to the Ad Hoc
Committee).
- Julie Hamilton letter to the Ad Hoc Committee, dated 2/27/13, regarding the Hillel
DEIR.

This comment is a copy of the motion made by the La Jolla
Community Planning Association (LJCPA) regarding the EIR and
serves as an introduction to comments that follow. Responses to
each of the issues are detailed in response to individual comments
below.
With respect to alternative locations, CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.
**K-2 (cont.)**

This comment suggests an alternative using land north of Genesee Avenue. This suggested alternative also would not meet several of the project objectives, including:

- Provide a permanent religious space in a centralized location for Jewish students at UCSD which, because of separation of church and state issues, cannot be built on the UCSD campus, but is located close to UCSD to serve students where they live and attend classes.

- Enhance the pedestrian access, orientation, and walkability of the area surrounding the project site.

- Contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.

- Contribute to the longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses on a property owned and maintained by Hillel for use by UCSD students.

Because the suggested alternative would not reduce impacts and would not meet a majority of the project objectives, this suggested alternative would not be feasible.

**K-3**

See response to comment K-2.

**K-4**

This comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. Therefore, no further response is required.

**K-5**

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full
access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.
To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.

K-7

The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

K-8

With respect to the inclusion of the Venter Institute as a cumulative project, see response to comment K-5. The UCSD Long-Range Development Plan (2004) includes a development “allowance” on each site, which is in turn used to project potential future traffic volumes. Those volumes are included in the SANDAG traffic model, which was used in the traffic impact analysis for the project. Therefore, the maximum development potential of that and other UCSD properties were included in the cumulative traffic analysis.

As shown in Figure 7-1 of the EIR, other projects along Torrey Pines Road and North Torrey Pines Road include the Palazzo Condominiums (#9), the Salk Institute (#3), the Torrey Pines Glider Port (#14), and the Scripps Green Hospital (#12). Based on the results of the traffic analysis, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

As previously detailed in response K-5, EIR Section 4.2.3.1(a) includes the Venter Institute project in the cumulative analysis. The Venter Institute has revised the site plan to only
provide access to Expedition Way (full access driveway). Access to Torrey Pines Road would be eliminated. Thus, the cumulative analysis in the EIR utilizes the trip assignment associated with full access on Expedition Way.

Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, "Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD." As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “. . . is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”
As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

See response to comment K-9a.

Cumulative impacts are considered in Chapter 7 of the EIR. Speculating about what 60 other religious organizations potentially could or could not do is beyond the scope of this environmental review. There is no growth inducing impact here, as discussed.

With respect to noise, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m., and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. While additional visitors could be located within structures, the on-site noise sources anticipated from the project site would include activities at the courtyard and patios. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices within these exterior areas, noise levels would be 43.4 dB(A) at the closest adjacent...
residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.

Sections 4.8.3.1 and 4.8.3.2 have been revised to include a brief discussion of potential noise impacts associated with anticipated special events at the Hillel facility that could attract more than the general daily average amount of visitors. It was determined that impacts would be less than significant.

As discussed in response to comment K-9b, and detailed in the project description (Chapter 3 of the EIR), the project proposes a facility that would be used primarily for religious purposes and is not a university center. Section 4.8.1.1(a) of the Final EIR has been clarified for consistency with the project description. The possible noise standard that would apply to the project would be 65 CNEL, similar to the standard for a place of worship.

The City’s Noise Abatement and Control Ordinance apply to the exposure of adjacent land uses to noise generated on the project site. The noise limits are one-hour average noise levels and are applied at the property line. See response to comment K-10.
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<tr>
<th>LETTER</th>
<th>RESPONSE</th>
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<tbody>
<tr>
<td><strong>K-12</strong></td>
<td>This comment provides regulations quoted from the City Land Development Code and does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.</td>
</tr>
<tr>
<td><strong>K-13</strong></td>
<td>The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.</td>
</tr>
<tr>
<td><strong>K-14</strong></td>
<td>The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.</td>
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<td>LETTER</td>
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| K-15   | The elevations of each building associated with the Phase 1/Phase 2 project are shown in Figures 3-12a and 3-12b of the EIR. Phase 2 building heights would not exceed 30 feet (range from 18 to 28 feet), and would be consistent with the LDC, Coastal Height Overlay Zone, and the Design Manual.

As detailed within Section 4.12.4.1(a) of the EIR, the site is visible from La Jolla Village Drive, a Primary Arterial roadway where 44,790 vehicles travel per day. Phase 1/Phase 2 was designed to “be consistent with the surrounding development and natural topography through considerations of height, bulk, signage, and architectural style. See response to comment K-15. |
LETTER

16. Level of Activity. There will be many more people using Hillel than a single family house and the activity will be at all hours of the day and evening. The activities from several locations will be consolidated here. If the facility is successful, than activity level will be greater than the current sun.

17. Traffic, ADT. Hillel currently yields 200 ADT, a single family house yields 10 ADT.

18. People. more people with more noise than Single Family zones. Hillel states an artificial limit on the number of students using the center. If it is successful, the number of students will certainly be greater than stated.

19. No Enforcement. There is no mechanism to maintain or enforce the level of activity or number of people at events.

14. from Dr. Starr’s Letter Omission 4, Site’s required use and dedication of La Jolla Scenic Way: Open space on the site is required as mitigation of development on Gilman Dr. Driveway access to the project on La Jolla Scenic Way violates the dedication of La Jolla Scenic Way. See Dr. Starr’s Letter for complete content.

IV. Project Objectives.

15. A. Goal of walking distance. UCSD is - 2 1/2 miles E to W, and - 1 1/2 miles N to S with classrooms and dorms spread throughout. Locating a student center at any point on the UCSD periphery cannot satisfy the walking distance goal because of the homogenous spread of dorms and classrooms. There is simply no single point to be near.

16. B. There is to be a consolidation of uses from different areas to this site, yielding an increase in intensity of use at the single location.

17. C. There is no enforcement of Hillel’s stated limits of use.

18. D. Purpose of the Facility.

House of Worship or Student Center? DEIR pg 3-15 Table 3-1,

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<tr>
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<th>DEIR pg 3-15</th>
<th>Table 3-1</th>
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<tr>
<td>Student Center</td>
<td>3,682 sq ft</td>
<td>57%</td>
</tr>
<tr>
<td>Library/Chapel</td>
<td>984 sq ft</td>
<td>15%</td>
</tr>
<tr>
<td>Leadership Building</td>
<td>1,813 sq ft</td>
<td>28%</td>
</tr>
<tr>
<td>Gross Building Area</td>
<td>6,479 sq ft</td>
<td>100%</td>
</tr>
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</table>

Of the floor area, only 15% is for Library-Chapel, yet 57% is for a Student Center. Ostensibly, teaching Leadership is also a Student Activity (then 85%). The obvious conclusion is that the Project is a Student Center, which is not an allowed use in a Single Family Zone.

19. Paraphrased Summary from Dr. Starr’s Letter. Inaccuracy 2, Attendance: (The inclusion of a large kitchen and square footage lend themselves to greater uses than stated.) See Dr. Starr’s Letter for complete content.

20. V. Parking. An unacceptable land use impact would arise if the City declared this a religious institution but failed to apply the parking standards for a religious institution.

RESPONSE

K-16 With respect to the allowable level of occupancy at the facility, as stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

K-17 See response to comment K-6.

K-18 See response to comment K-10 and K-16.

K-19 See response to comment K-16.

K-20 There is no such requirement and the commenter does not provide evidence of such requirement. The project site is owned by Hillel.

K-21 As detailed in Section 3.1 of the EIR, one of the project objectives is to “contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.” The Phase 1/Phase 2 project meets this objective because while religious in nature, the facility will serve students who would be able to walk to and from campus within a reasonable distance.

K-22 The project proposes to relocate the Hillel facility from its current location to an expanded facility. The uses would remain the same. See response to comment K-16. The level of activity and attendance numbers would be enforced through the conditions of approval of the Site Development Permit.
K-24  The project represents a religious use which, like other churches, temples, and places of worship, would inherently include some accessory uses, which are considered part of the primary use. As detailed in Section 3.4.2 of the EIR, the proposed project would include multiple component parts which support the primary use of project (see response to comment I-1). Besides the library/chapel, religious activities would take place in the lounge and meeting rooms, as well as the outdoor courtyard space. The kitchen would be used to prepare traditional meals during religious holidays. Bathrooms are necessary for religious staff members and visitors. A shower is necessary to encourage bicycling to the site and a commonplace within facilities of this nature.
K-26  Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities
surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

With respect to Omission 2, the project driveway provides sight distance meeting City standards. The claim of “dangerous turns,” unsafe visibility, and dangerous blind curves are unfounded. See response to comment K-40.

As detailed in DEIR Section 4.2.5.1(a), vehicles may currently use the La Jolla Scenic Drive North cul-de-sac as a turnaround area. As shown in Figure 4.2-2 during the AM peak hour (highest hour between 7-9 a.m.), no vehicles turned into the cul-de-sac from La Jolla Scenic Drive North, and only two vehicles turned into the cul-de-sac from Cliffridge Avenue. Only seven vehicles turned into the cul-de-sac during the PM peak hour (highest hour between 4-6 p.m.).
Finally, the above items will be arranged into a Motion for a response to be presented to the LJCPA for a vote on 7 March 2013.

K-30 (cont.)

Phase 1/Phase 2 would vacate the westerly cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. The vacation of the street right-of-way and street reconfiguration will provide pedestrian improvements at this location.

K-31

Neither the Phase 1/Phase 2 project nor the Existing with Improvements Alternative is an office building, nor are they considered office uses. As discussed in Chapter 3, Project Description, the project entails a facility that would be used primarily for religious purposes, with space for religious learning, community-building, and spiritual counseling. This is an allowable use in the Single Family Zone.

As detailed in Section 3.0 of the EIR, the Cliffridge property is currently used to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD in accordance with the Hillel Articles of Incorporation (see response to Comment K-24). The Hillel staff at the Cliffridge property support the religious programs for the organization. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the City Municipal Code. The comment correctly states that a deviation would be required for the additional six parking spaces; however, a deviation would not be required for a reduction in landscape/increase in hardscape. The FEIR has been revised to remove reference to this deviation.

As discussed in EIR Section 4.1.3.1(a), during Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut, instead of a 24-foot-wide curb cut for the Phase 1 site. The temporary parking area would provide parking for Hillel staff members during Phase 1. The proposed deviation would not result in significant environmental effects. A Residential High Occupancy Permit is not required for either the Phase 1/Phase 2 project or the Existing with Improvements Alternative, as neither involve a residential component. This type of permit is required for a single dwelling unit with six or more persons 18 years of age and older residing for 30 or more consecutive days (see Section 123.0502 of the Municipal Code).
LETTER

Phil Merten 27 Feb 2013

please consider the following comments:

Section 4.12. of the EIR deals with 'Visual Effects and Neighborhood Character'

Section 4.12.1.3 deals with 'Applicable Design Regulations'

Section 4.12.1.3 (b) Land Development Code/La Jolla Shores Planned District Ordinance, includes excerpt from the La Jolla Shores PDO which states:

General Design Principle and Requirements

Design Principle:

Originality and diversity in architecture are encouraged. The theme "unity with variety" shall be a guiding principle. Unity without variety means simple monotony; variety by itself is chaos.

No structure shall be approved which is substantially like any other structure located on an adjacent parcel. Conversely, no structure will be approved that is so different in quality, form, materials, color, and relationship as to disrupt the architectural unity of the area.

This section of the report also correctly states:

Single-Family Zone Development Regulations

The specific LJSD Development Regulations for the Single Family Zone that are relevant to the visual aspects of the project include the following:

• Building and structure setbacks shall be in general conformity with those in the vicinity.

RESPONSE

K-32 27. The report correctly identifies building and structure setbacks being in general conformity with those in the vicinity as being a relevant design regulation, but never attempts to explain how the proposed project complies with this regulation. This glaring omission may be due to the fact that the proposed build and structure setback along La Jolla Scenic Drive North are not in general conformity with those in the vicinity (across the street) and therefore is so different in relationship to the street that the project will disrupt the architectural unity of the area.

K-33 28. The front exterior walls of the existing dwellings along the south side of La Jolla Scenic Drive North have front yard setbacks on the order of 40 feet. These structures have attached garages of 22 to 24 feet in width that are setback 12' to 15' from the front property line. The cumulative affect of the existing dwellings are front yard structure setbacks that alternate between 12' and 36' and 15' and 40' and 12' and 40' and 15' and 36' etc. along the entire length of La Jolla Scenic Drive North. In contrast, the subject
LETTER

southeastern building proposes a south building facade 80' long setback 10' to 11' from the street property line, and the subject western building proposes a south building facade 70' long setback 10' to 11' from the street property line. Taken together these two structures present a facade of more than 170' in length setback just 10' to 12'. The subject development and its proposed setback from La Jolla Scenic Drive North is definitely not in general conformity with those in the vicinity; and the form and relationship of the proposed structures to the street is so different in relationship from that of existing structures in the vicinity that the proposed project will disrupt the architectural unity of the area. Therefore, the proposed project is not in accordance with the General Design Principal section or the Building and structure setback regulations of the LJPDO.

K-34  Finally, the LJPDO states:

General Design Regulations

Concurrent with the adoption of the La Jolla Shores Planned District Ordinance, the City Council adopted architectural and design standards, by resolution, to be used in evaluating the appropriateness of any development for which a permit is applied under the La Jolla Shores Planned District Ordinance; such architectural and design standards shall be filed in the office of the City Clerk as a numbered document.

29. The numbered document is the La Jolla Shores Design Manual. Unfortunately, the EIR makes no mention of the La Jolla Shores Design Manual or three of its provisions that state:

30. To conserve important design character in La Jolla Shores, some uniformity of detail, scale, proportion, texture, materials, color and building form is necessary.

and

31. Create harmonious form relationships among houses. Groups of houses should appear related to one another rather than jumbled together without pattern.

32. Strive for consistency within groups through use of recurring shapes and materials. All the houses in one eye span should be designed to tie together and relate to one another.

This is just another glaring omission from the draft report relating to neighborhood character.

RESPONSE

Ms. E. Shearer-Nguyen  
Environmental Planner  
City of San Diego Development Services Center  
1222 First Avenue, MS501  
San Diego, CA 92101  

e-mail: DSDEAS@sandiego.gov

Subject: UCSD Hillel Center for Jewish Life, Project No. 212995

Dear Ms. Shearer-Nguyen,

Thank you for providing the Recirculated Draft EIR for the subject project, previously known as Hillel of San Diego Student Center II. I am grateful that you have managed this process gracefully and with professionalism. The following comments are provided with respect.

I note the following inaccuracies and omissions:

**33. Inaccuracy 1, Religious Characterization:** The UCSD Hillel Center for Jewish Life formerly known as Hillel of San Diego Student Center II is characterized in the recirculated DEIR as a "church... temple... or building... of a permanent nature, used primarily for religious purposes." The development, on the contrary, is a student social center as the original name implies. This is made abundantly clear by public remarks of the promoter of the project Mark Steele, on October 27, 2010: "The facility really is primarily a student center, study center, some office space, and that is no longer to be used for any major gatherings whatsoever." Thus, within the meaning of the La Jolla Shores Planned District Ordinance, it is not a permitted use --- university facilities are not allowed in the LJSPD.

That the project is a student activity center --- as its original name implies --- is verified by the Hillel of San Diego mission statement (Appendix 1). The mission statement clearly defines Hillel as a student social organization with an ethnic/religious affiliation, not a church, temple, or synagogue.

The use of the project for large social gatherings is verified by the details of the structure: a 400 sq. ft. kitchen with 8-burner stove top; ground floor men's lavatory with two toilets, one urinal, three sinks, and a shower, ground floor women's lavatory with three toilets, three sinks and a shower. The 3,682 square foot HCJL Student Center and the 1,813 square foot HCJL Professional Leadership Building dwarf the 984 square foot library/chapel. This is not a structure primarily for religious purposes --- a building (library/chapel) may be for religious purposes.

With respect to whether the project is an allowable use in the zone, see response to comment K-9b.

With respect to uses of the building, see response to comment K-24.
K-36  
**34. Inaccuracy 2, Attendance:** The DEIR asserts that except on "rare" occasions, maximum public attendance at the project will be 50 persons, and that large events, e.g. Shabbat meals, will not be held at the project. Of course this estimate is not binding on future use of the facility. The assertion is simply inconsistent with the design of the project. It is a 6,479 square foot structure that includes a 400 sq. ft. kitchen with 5-burner stove top; ground floor men’s lavatory with two toilets, one urinal, three sinks, and a shower; ground floor women’s lavatory with three toilets, three sinks and a shower. The structure includes ample space and accommodations for gatherings of hundreds of persons, Shabbat meals, guest speakers, holiday celebrations. The showers (to accommodate bicycle traffic) can also facilitate overnight accommodations (e.g. at Sukkot). Expansion of open assembly space in the structure can be arranged without additional permits by interior remodeling. The 2006 version of the proposal was explicit in including weekly Shabbat meals and holiday celebrations; the current proposed structure is suited to accommodate them.

The relevant attendance figure is not the applicant’s estimate of future use, but the occupancy load of the building. A building with approximately 3000 square feet of open assembly space, 984 square feet of library, and approximately 1000 square feet of offices would ordinarily imply an occupancy load of approximately 290 persons (see http://www.scribd.com/doc/132840622/Section-1004-Occupant-Load). That is the peak use figure that is relevant.

K-37  
**35. Inaccuracy 3, Required Parking:** The DEIR includes a remarkable misstatement, “There are no specific parking regulations for the proposed use of Phase 2 of the HCJL in the City’s Municipal Code.” On the contrary, of course, the LJSPDO and the Municipal Code are quite clear in Municipal Code section 1510.0107(a) and 142.0530(c) Table 142.05SF. If one accepts the recirculated DEIR’s premise that the proposed use is a “church… temple… or building… of a permanent nature, used primarily for religious purposes” then the municipal code requires “Churches and places of religious assembly” to provide “1 [parking space] per 3 seats; or 1 per 60 inches of pew space; or 30 per 1,000 square feet assembly area if seating is not fixed.” The 27 proposed parking spaces are suitable for 900 square feet of assembly area. The actual structure of 6,479 square feet might then be construed to require 195 parking spaces. Of course interior open space suitable for group assembly in the structure is smaller, approximately 3000 square feet. A minimum of ninety (90) parking spaces is required by the LJSPDO and the Municipal Code; the proposal is at least 63 parking spaces deficient.

Perhaps the recirculated DEIR is premised on semantic misinterpretation, that the HCJL is “building… of a permanent nature, used primarily for religious purposes” but not a “place of religious assembly.” The intent of the Municipal Code is clear — those terms are intended as synonymous.

K-38  
**36. Inaccuracy 4, Precedent:** Section 6.3 of the DEIR notes “development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively.” Locating UCSD facilities, purported to be religious, in the single-family residential area sets a precedent. There are dozens of religiously affiliated organizations at UCSD, ranging from the Acts 2 Fellowship, to the Zoroastrian Youth Communion of San Diego (see http://tonga.ucsd.edu/stuexternlist/RDoWkList.asp?ArtName=18). If the Hillel project is approved, each would then be able to cite the Hillel project as precedent, showing that it also should be allowed to locate in the residential neighborhood. The
LETTER

The recirculated DEIR correctly notes that such follow-on development requires financial support and a choice of location. Phase I creates an ample precedent.

Quoting from the recirculated DEIR:

While there is a potential for other UCSD student religious organizations to seek off-campus facilities in the project area, the constraints of finding a suitable site would be a limiting factor. The area in which the project is proposed is mostly developed, with UCSD and Scripps in close proximity to the project site as well as existing residential uses. Although there are small pockets of undeveloped land nearby, future development in this area is largely constrained by existing development, allowed uses, permitting, and environmental review requirements, and the cost of acquiring land. Therefore, development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Translated these remarks: the precedent is indeed set. Approval of the HICUL project (formerly known as Hillel of San Diego Student Center II) means that any UCSD student religiously-affiliated organization with enough money to buy several adjacent (already developed) lots will be freed by the HICUL precedent to install its own student center in the single-family neighborhood. The single-family area can become a neighborhood of religiously affiliated student organizations and their administrative offices.

K-39

RESPONSE

K-39

See response to comment K-28. For specific responses related to the narrowing of the roadway and loss of on-street parking, see responses to comments K-7 and K-27, respectively.
A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.

See response to comment K-35.

See response to comment K-20.

See response to comment K-5.
Appendix 1: Hillel of San Diego Description and Mission Statement (from http://sasdihillel.org/about January 26, 2013)

About

Hillel of San Diego, accredited by Hillel: the Foundation for Jewish Campus Life, serves an estimated 5000 Jewish undergraduate and graduate students at institutions of higher education across San Diego County. Students from all backgrounds are invited to participate in Jewish life on campus. Social, cultural, educational, and community service programs provide opportunities for students to build relationships with each other and develop Jewish community.

Hillel of San Diego Mission Statement

To be a vibrant Jewish campus presence and to involve the maximum number of university-age Jews in ways that foster a lasting commitment to Jewish life.

To further this mission, we commit ourselves to the following goals:

- Serving the needs of individual Jewish students
- Creatively engaging and empowering Jewish students through personal interactions and compelling programs
- Building a strong sense of belonging and Jewish identity
- Nurturing intellectual and spiritual growth in a pluralistic community
- Advocating for Jewish student needs on campus and in the community
- Linking the campus community to the larger Jewish community, locally and globally
- Helping students cultivate a closer connection to Israel
- Developing a campus and organizational culture in which the quality of the relationships attracts involvement.
The EIR provides an accurate project description (see Chapter 3) in accordance with the requirements of Section 15124 of the CEQA Guidelines. Specifically, the existing vacant lot upon which the project is proposed is a total of 0.80 acre. The project also includes a ROW vacation which would add an additional 0.49 acre to the project site. Therefore, upon project approval, the total site would be 1.29 acres. See EIR Figures 3-1 (size and location of ROW vacation) and 3-3 (final boundaries of the project site).

With respect to the comment relating to the description of the project as a student center, see response to comment K-9b.

All EIR noticing requirements under CEQA were followed by the City as Lead Agency. The Notices of Availability of the Draft EIR were widely distributed to agencies, organizations, and individuals who were known to have an interest in the project. In addition, the notice was published in the San Diego Daily Transcript. The notices included a website indicating where the Draft EIR could be found.

See response to comment K-44.

The project objectives detailed within the EIR include the underlying purpose of the project and are provided pursuant to CEQA in order to help the lead agency develop a reasonable range of alternatives to evaluate (Section 15124(b) of the CEQA Guidelines). See response to comment K-21 (second paragraph). As detailed in Section 3.1 of the Draft EIR, one of the project objectives is to "contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections." The Phase 1/Phase 2 project meets this objective because while religious in nature, the facility will serve students who would be able to walk to and from campus within a reasonable distance.

Pursuant to CEQA Guidelines Section 15126.6, an EIR is required to describe a range of reasonable alternatives to the project, or location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The EIR did not identify any significant impacts with regards to land use (Section 4.1), transportation/
The Reduced Project alternative does not result in a reduced project - it eliminates the Library/Chapel and the second floor of the Student Center, but retains the use of 1976 Cliffridge for the Student Center. This alternative actually results in a larger student center than the proposed project. It may reduce impacts on community character through a reduction in structure size but it does not reduce the parking impact because the square footage is more than proposed. This impact also does not reduce traffic impacts or land use impacts. In addition, there is nothing to prevent future expansion of the center.

The “Site 673” alternative is a red herring. As an initial matter, the DEIR fails to adequately describe the location or existing setting of this site. There is no map within the DEIR showing the location of the site. The site location described is deceptive in that it leads the reader to believe the site is located at the corner of Galmar Drive and La Jolla Village Drive. In fact, Site 673 is located more towards the middle of the block along La Jolla Village Drive between the theater district and La Jolla Village Dr. It is unlikely this is the only alternative site within walking distance of UCSD. Regardless, this site is steep and small - it does not meet the standards for an alternative site.

Project Description

The EIR must contain an accurate, stable and consistent project description with sufficient specific information to allow a complete evaluation and review of the project impacts. The EIR must consider the “whole of the project” and include foreseeable future activities that are a consequence of project approval.

The project description is not accurate, stable and consistent. The project description is confusing and difficult to read throughout the different sections of the DEIR, including the notice of availability, summary and DEIR. The project description repeatedly fails to recognize the project as a student center, minimizing any references to the purpose of the project to serve the students of UCSD. The size of the site is described as .2 acres for 1976 Cliffridge and .8 acres for Site 673 - is that the size of the site before or after the vacation?

The project site should be described with the lot size prior to the vacation consistently throughout the document. The project description should accurately describe the vacation of public right-of-way and provide a numerical value to the amount of land acquired through the vacation.

The project description for the Existing with Improvements Option varies between the notice of availability (religious programs), project synopsis (administrative offices, one-on-one counseling, and meetings with students, p.8-1), and project description (permanent office and administrative use, p.3-15). The Cliffridge property is currently used for administrative offices; a use that is not allowed in the single family zone of the La Jolla Shores Planned District.

The project description relies on artificial limitations on the number of students using the student center by stating “attendance would not be expected to exceed 100 persons at any one time.” p. 3-19. CEQA requires the project description include all reasonably foreseeable...
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<td>K-51</td>
<td>The EIR provides an accurate project description (see Chapter 3) in accordance with the requirements of Section 15124 of the CEQA Guidelines. All component parts of the project description are specifically explained and included with the analysis of project impacts. See responses to comments K-16 and K-44.</td>
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<td>K-52</td>
<td>See response to comment K-51.</td>
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<td>With respect to the allowable use of the project site, see response to comment K-9b.</td>
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<td>With respect to the specific acreage of the site (with and without the ROW vacation), see response to comment K-44.</td>
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<td>K-53</td>
<td>See response to comment K-44.</td>
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<tr>
<td>K-54</td>
<td>The project description for the Existing with Improvements option is included in Section 9.2 of the FEIR. As an alternative to the Phase 1/Phase 2 project, Hillel would permanently use the Cliffridge property (subject to required improvements) to provide for religious programs for Jewish students at UCSD. Permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the Municipal Code would be required for the permanent use.</td>
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<td>The administrative use included in the Existing with Improvements Alternative (like the proposed project) would be defined as part of the primary use and allowed under the Municipal Code. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single-Family Zone in accordance with the LJSPD Ordinance. The Cliffridge property is not an “administrative office” as identified within the comment.</td>
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<tr>
<td>K-55</td>
<td>See response to comment K-16.</td>
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activities, meaning the project description must rely on the maximum capacity of the proposed student center rather than artificial limitations on attendance with no means of enforcement.

**K-56**

All of the required discretionary approvals are listed within Section 3.3 of the EIR. A lot consolidation parcel map is not a discretionary approval.

See response to comment K-54 regarding the administrative use. The figures in the EIR provide additional and sufficient information for the general public and decision makers to make an informed decision regarding the aesthetic footprint of the project. Engineering-scale drawings were made available to the public for review at the City of San Diego Development Services Department.

**K-57**

As required under CEQA Guidelines Section 15125(a):

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published.

The NOP was published on October 8, 2010. Therefore, the baseline conditions are adequately described, and conditions prior to that date (i.e., in the year 2000) are not applicable according to CEQA. The history of the project is summarized in Section 3.6 of the EIR.

**K-58**

With respect to the use of the project site as "open space," in November 2000, site 653 was evaluated for potential incorporation into the City's Park and Recreation Department's open space inventory. As detailed in a City memo from the Director of the Park and Recreation Department (McLatchy 2000), the parcel did not meet the City's definition as an open space parcel, as it is "completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value." See EIR Section 3.6.1.

**K-59**

See response to comment K-54.

**K-60a**

See response to comment K-31 (3rd paragraph). The hypothetical situation described by the comment regarding Hillel's abandoning the property and future mini-dorm use is highly speculative.

**K-60b**

The hypothetical situation does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. Therefore, no further response on this issue is required.
Please see the responses to comments K-26 and K-37.

See responses to comments K-9a and K-9b.

With respect to the project’s noise compatibility, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m. and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.

The project does not result in significant land use impacts. As detailed in Section 4.1 and 4.12 of the EIR the project would be consistent with all relevant land use regulations. See response to comment K-14.

EIR Section 4.1, Land Use includes a discussion of the project with respect to the City’s General Plan, the La Jolla Community Plan, the LJSPDO, and the La Jolla Shores Design Manual (which was included in the recirculated EIR, January 2013). The EIR concluded that there were no inconsistencies with the goals, policies, and objectives of these plans; therefore, no significant land use impacts were identified. With respect to the allowable use of the project, see response to comment K-9b.

The Phase 1/Phase 2 project would generate a total of eight peak-hour trips. The City of San Diego does not require an analysis of roadways to which a project is forecasted to add less than 50 peak-hour trips as less than 50 peak-hour trips would not be a considerably significant contribution to roadway impacts. Since the
The Venter Institute project is analyzed in the cumulative projects within the recirculated EIR (December 2013).

Additionally, the project entails a facility used primarily for religious purposes, and is not a “student center” as identified within the comment.
See response to comment K-66. The project would contribute less than 50 peak hour trips to Cliffridge Avenue; therefore, an analysis of this roadway is not required per City of San Diego standards.

Additionally, the project entails a facility used primarily for religious purposes, and is not a “student center” as identified within the comment.

The recirculated EIR includes this information (December 2013). Please refer to EIR Section 4.2.1.2(b). As stated therein:

Current local bus and express bus transit service is provided in the La Jolla Community via Routes 30, 41, 101, 921, and 150. A bus stop is located on the south side of La Jolla Village Drive adjacent to the project site (that is proposed to remain). The UCSD campus has an on-site Campus Loop Shuttle system that runs weekdays from 7:00 a.m. to midnight and weekends from 9:00 a.m. to 8:00 p.m.

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking.
relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
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The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City's Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

See responses to comments K-7 and K-28 relating to traffic hazards due to the reduction of width of La Jolla Scenic Drive North.

Intersection sight distance determines the sight distance required for drivers coming from a minor leg to see a vehicle on the major roadway. Stopping sight distance determines the appropriate distance for a vehicle to come to a stop once an object obstructing the roadway becomes visible.

The minimum stopping sight distance is 200 feet for vehicles traveling at 30 mph. However, based on an actual speed survey, the 85th percentile speed on La Jolla Scenic Way is 22.8 mph. At that speed, the stopping sight distance required on an incline of 6 percent is 130 feet based on the American Association of State Highway and Transportation Officials (AASHTO) Green Book. Therefore, 150 feet is adequate for vehicles to stop once an object on the roadway becomes visible.
The Highway Design Manual (HDM) only provides guidance on sustained downhill conditions. However, the HDM refers to the AASHTO Green Book for additional information and guidance. Based on the AASHTO Green Book, the prevailing speed and the difference in elevation, the required stopping sight distance is 130 feet.

Intersection sight distance was reevaluated as part of comments received during public review. In order to provide adequate intersection sight distance, the project would require the parked vehicles on the west side of La Jolla Scenic Way to be removed for a vehicle to safely turn from the project driveway.

A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.

Section 4.12 of the EIR (Visual Effects and Neighborhood Character) describes the existing conditions of areas surrounding the project site. This section was updated as part of the recirculated EIR (December 2013). The environmental setting of the project is adequately described.

See responses to comments K-13 and K-14.

Section 4.12.3.1(a) of the recirculated EIR (December 2013) was updated to include an analysis of all visible walls that would be included with the Phase 1/Phase 2 project. Furthermore, Figure 3-10 of the EIR shows the landscaping elements of the Phase 1/Phase 2 project that would be used to screen the walls from visibility.
Section 4.12 of the EIR (Visual Effects and Neighborhood Character) analyzes the visual effects associated with the Phase 1/Phase 2 project. This includes the organized appearance; height, bulk, and coverage consistency; varied visual environment; bulk and scale; and architectural style and building materials. As concluded, the Phase 1/Phase 2 project would not result in a significant visual impact.
not promote harmony in the visual relationships and transitions between new and older buildings. Therefore, the student center will have a significant visual impact.

The project proposes a two-story, 6,500 square foot student center in a single family residential neighborhood characterized by single story residences on large lots with varying front yard setbacks. The project site is a visually prominent site located at the entrance to UCSD and the La Jolla Highlands. The proposed project presents a significant visual contrast to the surrounding single family residential community and places a large institutional structure on a vacant lot that is essentially the entrance to the La Jolla Highlands neighborhood. There is no evidence to support the conclusion the project will not have a significant impact on the visual quality of the area and the community character. This is particularly ironic given the efforts of the three religious institutions in the neighborhood to minimize their impact on the visual quality and community character of the neighborhood.

Significant Unavoidable Environmental Effects/Irreversible Changes

The DEIR fails to recognize and acknowledge significant impacts on Land Use, Transportation/Circulation Parking and Visual Effects and Neighborhood Character.

Growth Inducement

The proposed project is a student center with a religious affiliation attempting to be categorized as a building of a permanent nature, used primarily for religious purposes. In addition, if the Phase 1/Phase 2 project is not approved, the DEIR characterizes the administrative offices of this student organization as a building of a permanent nature, used primarily for religious purposes. If this interpretation of the La Jolla Shores Planned District Ordinance is allowed, it will set precedence for allowing any student organization with a religious affiliation to follow suit. There are more than 50 similar organizations at UCSD, all of which could propose a similar project in this neighborhood. Therefore, the proposed project will have a significant growth inducing impact because it allows a use not previously allowed in this zone.

Cumulative Impacts

The DEIR fails to consider the Venter Institute located directly across Torrey Pines Road from the project site. Therefore, the cumulative impacts analysis is incomplete.

Project Alternatives

CEQA requires the DEIR evaluate a reasonable range of alternatives that would feasibly attain the project objectives but would avoid or substantially lessen the significant effects of the project. The stated project objective of locating the project along souther portion of UCSD artificially limits the consideration of alternative sites. There is no justification for this limitation as it does nothing to promote the objective of serving students where they live and attend classes. There is no evidence the Hilltop students only live and attend classes along in the
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<td>southern portion of UCSD. In fact, housing is provided in several areas on and adjacent to the campus and is not limited to the southern portion of the campus.</td>
<td>K-84  See response to comment K-2.</td>
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<td>K-84  The DEIR fails to provide a reasonable range of alternatives and fails to provide a viable alternative site. The alternative site discussed is a red herring in that it is essentially a steep hillside between La Jolla Village Drive and the theater district at UCSD. The alternatives analysis fails to provide the information necessary for the public to adequately consider the site as there is no figure showing the location of the alternative site.</td>
<td>K-85  See response to comment K-49.</td>
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<td>K-85  The reduced project alternative does not result in a reduced project in that the combination of the reduced project and the Clifford Property results in a larger project than the proposed project.</td>
<td>K-86  See response to comment K-48.</td>
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<td>K-86  The DEIR fails to acknowledge significant impacts to land use, transportation/circulation/parking and visual effects and neighborhood character – therefore the DEIR fails to consider feasible alternatives that eliminate or substantially reduce those impacts. Mitigation Monitoring and Reporting Program</td>
<td>K-87  Based on the analysis in the EIR, the project would not have significant impacts to land use, transportation/circulation/parking, and visual effects and neighborhood character. Therefore, no mitigation measures are required.</td>
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The design of the project does not negatively affect the La Jolla Village Drive/Torrey Pines Road intersection. Furthermore, the traffic study (see Figure 7-2) shows that the project would add only two peak-hour trips to the subject intersection, which amounts to one trip every 30 minutes. See also response to comment L-2.

There are bike lanes on La Jolla Village Drive along the project frontage so commuter bikers are not expected to utilize the proposed path the project is providing. Rather, it would be used by recreational bikers. Pedestrians and bicyclists arriving at the La Jolla Village Drive/Torrey Pines Road intersection will be able to use the controlled crosswalk at the Torrey Pines Road/La Jolla Village Drive intersection to cross these two streets safely.
The design of the project does not negatively affect the La Jolla Village Drive/Torrey Pines Road intersection. Furthermore, the traffic study (see Figure 7-2) shows that the project would add only two peak-hour trips to the subject intersection.

There are bike lanes on La Jolla Village Drive along the project frontage so commuter bikers are not expected to utilize the proposed path the project is providing. Rather, it would be used by recreational bikers. Pedestrians and bicyclists arriving at the La Jolla Village Drive/Torrey Pines Road intersection will be able to use the controlled crosswalk at the Torrey Pines Road/La Jolla Village Drive intersection to cross these two streets safely.

The UCSD Bicycle and Pedestrian Master Planning Study was added to the recirculated EIR (December 2013). Please see EIR Section 4.2.1.2(a).

The study identifies “off-campus improvements”; however, UCSD does not have jurisdiction over these roadways. The study identifies improvements at the intersection of North Torrey Pines Road and La Jolla Village Drive:

- Improve bicycle and pedestrian amenities at intersection, including adding missing crosswalk.
- Install bicycle detection in all appropriate lanes and install Type D limit line detector loops.
- Modify signal timing to accommodate minimum green splits for cyclists.

The project would not conflict with any of these conceptual improvements. These improvements were not identified within the City’s Bicycle Master Plan Update (July 2013).

The project would enhance the safety for all transportation modes surrounding the project site, including bicycle circulation. As detailed in EIR Section 3.4.2.1(f), the project would enhance the corner of Torrey Pines Road and La Jolla Village Drive and provide an appealing entrance to La Jolla Shores community from the north. Landscaped open space areas would be located within the courtyard/inner yard and along either side of the bicycle/pedestrian
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<td>L-4 (cont.)</td>
<td>The parking lot/vehicular use area, and parkway strips along La Jolla Village Drive and La Jolla Scenic Drive North. An overview of the Phase 2 landscape plan is shown on Figure 3-10 and its plant palette is provided on Figure 3-11. Approximately 10,000 square feet of landscaping is required; however, the project would provide nearly 20,000 square feet of landscaped open space.</td>
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<td>L-5</td>
<td>The project is providing a path along La Jolla Village Drive and La Jolla Scenic Drive North, which will be a benefit to both pedestrian and bicycle circulation and reduce the need for vehicular movement. There are currently bike lanes along La Jolla Village Drive along the project frontage to serve bicycle traffic. See also response to comment L-4.</td>
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<td>L-6</td>
<td>The project’s Traffic Impact Analysis and Section 4.2 of the EIR adequately address all relevant traffic-related issues as required under CEQA.</td>
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Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “. . . is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

This comment identifies the location of the project and does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. Therefore, no further response on this issue is required.

This comment offers an opinion and does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. Therefore, no further response on this issue is required. However, the traffic study shows that the project will generate only 58 average daily trips. This small amount is within the day-to-day fluctuation in traffic and, therefore, the conclusion that there is only a minor adverse effect is accurate. For a detailed discussion of the project’s potential impacts on traffic and noise, see Sections 4.2 and 4.8 of the EIR.

This comment offers an opinion and does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. Therefore, no further response on this issue is required. However, for a discussion of alternative locations considered, see Section 9.2 of the EIR.

See responses to comments M-1, M-3, and M-4.
Neither the Phase 1/Phase 2 project nor the Existing with Improvements Alternative is an office building, nor are they considered office uses. As discussed in Chapter 3, Project Description, the project entails a facility that would be used primarily for religious purposes, with space for religious learning, community-building, and spiritual counseling. This is an allowable use in the Single Family Zone.

As detailed in Section 3.0 of the EIR, the Cliffridge property is currently used to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD in accordance with the Hillel Articles of Incorporation (see response to Comment K-24). The Hillel staff at the Cliffridge property support the religious programs for the organization. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the City Municipal Code. The comment correctly states that a deviation would be required for the additional six parking spaces; however, a deviation would not be required for a reduction in landscape/increase in hardscape. The FEIR has been revised to remove reference to this deviation.

As discussed in EIR Section 4.1.3.1(a), during Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut, instead of a 24-foot-wide curb cut for the Phase 1 site. The temporary parking area would provide parking for Hillel staff members during Phase 1. The proposed deviation would not result in secondary environmental effects. A Residential High Occupancy Permit is not required for either the Phase 1/Phase 2 project or the Existing with Improvements Alternative, as neither involve a residential component. This type of permit is required for a single dwelling unit with six or more persons 18 years of age and older residing for 30 or more consecutive days (see Section 123.0502 of the Municipal Code).

A temporary use permit would not be required for either the Phase 1/Phase 2 project or the Existing with Improvements Alternative. Both projects would be considered allowable uses under the Municipal Code as the facilities would be used primarily for religious purposes. See response to comment N-1.
Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

With respect to the loss of on-street parking, the construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional
spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR. With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

With respect to the safety of the improvements to the cul-de-sac, as detailed in DEIR Section 4.2.5.1(a), vehicles may currently use the La Jolla Scenic Drive North cul-de-sac as a turnaround area. As shown in Figure 4.2-2 during the AM peak hour (highest hour between 7-9 a.m.), no vehicles turned into the cul-de-sac from La Jolla Scenic Drive North, and only two vehicles turned into the cul-de-sac from Cliffridge Avenue. Only seven vehicles turned into the cul-de-sac during the PM peak hour (highest hour between 4-6 p.m.).

Phase 1/Phase 2 would vacate the westerly cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. The vacation of the street right-of-way and street reconfiguration will provide pedestrian improvements at this location.

A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.

Upon occupation of the new facilities under the Phase 1/Phase 2 project, the temporary use of the Cliffridge property would expire and revert back to single dwelling unit use. To identify subsequent ownership or residents of the Cliffridge property would be
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<td>N-5 (cont.) speculative and beyond the scope of the requirements of CEQA; however, there is no plan for the Cliffridge property to be used as an extension of the project. With regards to the cul-de-sac, the ROW vacation would be abandoned to provide landscaping, a pedestrian/cyclist parkway, and park-like amenities, and would not be utilized for parking as detailed in EIR Section 3.4.2.1(f).</td>
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<td>N-6 As stated in Section 3.1 of the EIR, one of the primary objectives of the project is to construct a permanent religious space for the provision of programs and activities for local students. Section 9.2.1 of the EIR explains why the Existing with Improvements Alternative would not meet the project objectives: Specifically, while there is no expectation that the larger facility would foster greater attendance, this alternative would not provide a consolidated location with adequate space for existing programs and activities along with ancillary uses as detailed in the project description.</td>
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<td>N-7 Please see response to comment N-1. Hillel was incorporated in the state of California on July 1, 1992, &quot;exclusively for religious purposes&quot; under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose &quot;... is to provide for the religious needs of Jewish students on the university campuses in San Diego County.&quot; As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, with a variety of religious programs such as meditation and prayer circles, programs relating to observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel as the Jewish homeland, and other Jewish religious, cultural, and social interactions. The commenter refers to activities that may occur at other Hillel sites, but other Hillel sites are not included in the project. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As a facility used primarily for religious purposes, the project would be an allowable use in the Single-Family Zone in accordance with the LJSPD Ordinance.</td>
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used “primarily for religious purposes”? What does "religious" mean in the context of a Student Center? UCSD Hillel’s activities do include small Torah study and Jewish history classes, a chapel also used as a library, support for Israel, and social activities among students of a common religious affiliation. But it is religious affiliation and “some” religious activity sufficient to qualify a building for permanent status as “primarily for religious purposes” when a range of non-religious activities typical of all other University Hillel programs around the country and at other University of California campuses will certainly be conducted here? Per various UC Hillel student center websites these include pizza parties, computers and tables available to study for general University classes, dance parties, movie nights, concerts, regular classes in folk dancing, folk singing, swing dance, salsa lessons, free weekly bagel brunches, and an “after-hours Café” which is dedicated to “good dessert, coffee, live music, comedy and fun, and open 6 nights a week,”.

N-8

N-9

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within residential zone. See also responses to comments N-1 and N-7.

N-10

Please see responses to comments N-7, N-8, and N-9.

Section 3.6 of the EIR describes the previous project history and the Phase 1/Phase 2 project changes. Regardless of the facilities name, mainly used to attract activity participants, the Hillel operated function is for religious purposes. Mr. Steele’s comments addressed the difference between a facility used for large-scale religious gatherings and a smaller facility that would provide religious space to smaller groups of students. This speaks in no way to the religious nature of the use.

With respect to the designated use of the project, see responses to comments N-1, N-8, and N-9.
As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that
could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
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| N-13   | See response to comment N-12.  
The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.  
Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.  
With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant. |
| N-14   | See response to comment N-12.  |
| N-15   | This comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response is required. However, for a discussion regarding the allowable use of the project site, see response to comment N-9. |
some fathers still tutor their children and/or grandchildren in the Torah in their homes and prepare them for their Bar Mitzvot. They gather with other Jewish families for Shabbat and to celebrate religious holidays. They interact with the larger community and encourage Jewish commitment and sense of community for themselves and their children. A home across the street from mine is the home of an Orthodox rabbi, and is often used for study, rituals and ceremonial gatherings, as well as for summer programs for children of that congregation.

The same could be said for many Christian and Muslim homes where religious prayers, studying, and rituals are conducted by the head of the household and families encourage affiliation with their larger religious communities.

Doesn’t the DEIR’s justification for a Hillel facility in the Single Family residential neighborhood essentially qualify all such homes as “primarily for religious purposes” and thus entitle them to tax exemption? Does that legitimize their convening large numbers of people on a daily basis, to hold classes, prayer and study sessions, and so forth, even if—like Hillel—they are not technically synagogues, or, in the case of non-Jewish homes, churches?

N-16 See response to comment N-10.

N-17 Showers are included in the design for Phase 1/Phase 2 in order to encourage cycling. The Phase 1/Phase 2 project would not have large gatherings, nor would any overnight activities occur. As detailed in EIR Section 3.4.2.1(a), Hillel’s regular hours of operation would be between Monday through Friday, 9:00 a.m. to 10:00 p.m., but generally the facility would only be open during the evenings and on weekends if there is an activity planned at such times. See response to comment N-11 for details on the project’s programming and enforcement through conditions of approval.

N-18 Section 3.4.2.1(g) of the EIR provides a description of the lighting proposed under the Phase 1/Phase 2 project. As detailed therein, all new buildings would install exterior lighting that would maintain light levels in accordance with the City’s regulations. Specifically, Municipal Code Section 142.0740 requires “[O]utdoor lighting fixtures shall be installed in a manner that minimizes negative impacts from light pollution including light trespass, glare, and urban sky glow in order to preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination.” The project would be conditioned to adhere to all City codes, the result of which would preclude significant impacts associated with light and glare.

N-19 See response to comment N-11.
This comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response is required.

A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.

With respect to the safety of U-turns, EIR Section 4.2.5.1(a) states the following:

Outbound traffic oriented to La Jolla Village Drive would make a southbound to northbound U-turn at the intersection of La Jolla Scenic Drive North and Caminito Deseo. A field observation of the available turning radius at Caminito Deseo was compared to the required minimum design internal turning radius of 36 feet. Based on the field visit under existing roadway conditions, it was observed that 40 feet of internal turning radius is available. Therefore, a U-turn is feasible at this intersection. Although a U-turn is feasible, additional traffic measures would be required to prevent potential conflict between U-turning vehicles and vehicles making a westbound to northbound right turn from Caminito Deseo onto La Jolla Scenic Drive. The traffic study recommends the installation of a stop sign on Caminito Deseo approaching La Jolla Scenic Drive.

Therefore, potential traffic safety concerns noted by the commenter related to U-turns were found to be less than significant, as detailed in EIR Section 4.2. A maximum of seven vehicles are expected to perform the U-turn during the PM peak hour.
N-22 The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

N-23 The recirculated EIR was updated (December 2013) to include information pertaining to the project's consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual
N-23 (cont.)

Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

N-24

Any specific request or coordination made in 1977 does not have any bearing on the proposed project. This comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response is required.

N-25

The project site does not maintain any public sight lines. Potential visual quality impacts of the Phase 1/Phase 2 project are analyzed in Section 4.12 of the EIR, including public viewsheds and applicable regulations from the LJPDO. See response to comment N-23.

N-26

There is no requirement under the City’s biological resource guidelines to observe the project site for four hours over multiple days. According to the City’s Land Development Manual – Biology Guidelines (amended 2012):

Surveys, for state or federally listed sensitive or MSCP-covered species older than 24 months must be updated, as appropriate, to accurately reflect resources on site. Surveys should be done at the appropriate time of year to detect presence/absence of sensitive species. If surveys are not done at the appropriate time of year, and the potential for occurrence is moderate to high (based on historical knowledge, site records, determination by the biologist, etc.), then it will be concluded that their presence exists on the property.

As detailed in EIR Section 4.3, no state or federally listed sensitive or MSCP-covered species were detected, nor have the potential, to occur on-site. As previously detailed, raptors and other migratory birds have the potential to nest in the eucalyptus trees within the eastern portion of the site. Out of an abundance of caution, and in conformance to City standards, biological surveys have been updated.

Biologists conducted a general biological survey site visit in May 2013 to update fieldwork conducted in 2010, 2007, and 2003.
Although no raptors or nests were observed during the multiple biological resource surveys conducted for the project, the trees on-site were determined to have moderate to high potential to support nesting raptors. Nesting raptors are considered sensitive during their breeding season. Therefore, it was concluded that their presence exists on the property, in conformance with the City’s biological resource guidelines.

Due to the fact that the presence of nesting raptors was assumed, a significant impact was identified (see Section 4.3.3.1(a)). In turn, mitigation is detailed in Section 4.3.3.3. In order to avoid impacts to nesting raptors, MM-BIO-1 requires if construction would occur during breeding season, that a qualified biologist survey the trees for raptor nests prior to construction. If nests are present, avoidance measures would be taken. Adherence to MM-BIO-1 would ensure that potential impacts to nesting raptors would be less than significant.

While the Phase 1/Phase 2 project site has trees that have the potential to support nesting raptors, the single ornamental tree on the Cliffridge property does not have the potential to support raptors. As stated in Section 4.3.3.2(b) of the EIR, direct loss of a single ornamental tree in order to construct the new parking lot and short-term activity for construction of the parking lot and interior renovation of the existing on-site structure would not require substantial clearing or grading or result in excessive construction noise affecting off-site resources. Therefore, direct and indirect impacts to raptors and breeding or nesting birds under this option would be less than significant.

With regards to how long construction would take under the Existing with Improvements Alternative, EIR Section 9.2.1 has been revised to state:

Construction includes demolition of the existing patio and garage, laying a new parking lot, and enhancing the landscaping, and would last approximately three to six months total, and would require no more than five workers per day.
N-27 (cont.)
Noise impacts under Phase 1/Phase 2 were analyzed in EIR Section 4.8. Indirect noise impacts to nesting raptors would not occur following construction as the trees on-site would be removed.

N-28 Mitigation measure BIO-1 was updated as part of the recirculated EIR (December 2013). The mitigation reads as follows:

To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to the City’s Development Services Department (DSD) for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City’s Biology Guidelines and applicable state and federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City’s Mitigation Monitoring Coordination (MMC) Section or Resident Engineer (RE), and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the precon survey, no further mitigation is required.
Adherence to this mitigation measure would ensure that impacts to nesting raptors would be less than significant.
LETTER

The traffic study utilizes a worst case scenario of up to 200 total daily trips as the basis of the study of daily traffic impacts. With respect to actual attendance and use of the project see response to comment N-11.

As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.
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<th>LETTER</th>
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<tr>
<td>N-30</td>
<td>See response to comment N-29.</td>
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<tr>
<td>N-31</td>
<td>See responses to comments N-6 and N-11.</td>
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<td>N-32</td>
<td>See responses to comments N-6 and N-11.</td>
</tr>
<tr>
<td>N-33</td>
<td>This comment represents the commenter’s opinion; however, for a detailed response related to project trip generation see response to comment N-30.</td>
</tr>
<tr>
<td>N-34</td>
<td>See response to comment N-30.</td>
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LETTER

(High Density Residential, 20 dwelling units per gross acre). The DEIR fails to mention that a large proportion of UCSB students live in the Isla Vista community in which the Hillel facility is located, making that Hillel facility inappropriate for accurate comparison. Both of these Hillel facilities have densely inhabited multiple-dwelling apartments housing students within yards of the facility. And the UCLA Hillel facility was built next to a previously existing large church facility with useable parking spaces. These factors all make the DEIR comparisons for both foot and traffic impacts misleading.

N-35

* The DEIR fails to consider that most junior and senior and graduate students live in off-campus housing, often necessitating that they drive to campus and to Hillel. The DEIR does not anticipate that evening programs are likely to reduce the number of walkers, especially among female students whose concerns about safety in the dark would be an issue. Fall and winter weather will similarly affect the choice of transportation.

N-36

* The DEIR does not adequately factor in the size of the campus and the distance from which students will likely have to travel to the Hillel facility. Many students will come to the facility directly from classes or dining facilities in the interior, northern and eastern areas of the campus, not necessarily from the closest dormitories, thus making the trek on foot longer and more time-consuming and less likely whether during the day or at night. And they will not all be coming at the same time from the same place in order to walk together or carpool, as classes are held at a variety of areas around the large campus, thus again making walking to the Hillel facility less likely than driving. The time pressure to get back to classes or to the libraries after a Hillel activity further reduces the likelihood of time spent walking, and increases the number of students likely to come by car.

N-37

* The DEIR Traffic study estimates daily trip figures for cars going in and out of the facility. They suggest a significantly larger impact on LJ Scenic Way than is predicted in the DEIR. Even conservatively, the DEIR Trip Generation Table projects 29 incoming and 29 outgoing car trips per day, totaling 58. However, there is no guarantee that these 29 vehicles will consistently or frequently carpool or that at least some may not leave and return more than one time a day for a multitude of reasons. Furthermore, the number of planned parking spaces (27) would be insufficient for 29 cars. Overall, the negative impact on daily traffic on the facility’s bordering streets is uncertain.

N-38

* The DEIR states that construction hours would be from 7am to 7pm, Monday-Saturday. Given the mere 30-foot or so distance of the project from residences if the street vacation is permitted, the DEIR totally ignores the impacts on families with small children, ill and elderly residents, and residents of all ages who study or who do teaching preparation at home during morning or afternoon hours, and the daily family meal times that will be disrupted. These hours of construction may be acceptable in commercial or mixed-use areas, but not in this proximity within a Single Family residential neighborhood.

N-39

* The DEIR underestimates the impacts of heavy equipment noise and other construction noises (such as hammering) on quality of life for what is projected to be a two-year

RESPONSE

N-35

See response to comment N-30.

N-36

See response to comment N-30.

N-37

It is not clear if the commenter is asserting that the EIR and Traffic Impact Analysis are somehow different; however, EIR Section 4.2 is based on the Traffic Impact Analysis, which is included as Appendix B to the EIR. Both Section 4.2 and Appendix B have the same information.

With regards to trip generation, EIR Table 4.2-4 presents a daily breakdown of student and staff activity on a typical weekday based on a midday arrival of 100 students and arrival and departure patterns derived from the events/program log provided by the applicant. As shown in Table 4.2-4, the project is estimated to generate approximately 58 daily trips, with an AM peak hour of seven vehicles and a PM peak hour of eight vehicles. This relatively low amount of vehicles would not result in a significant traffic impact on La Jolla Scenic Way.

As shown in Table 4.2-4, the vehicle trips assigned to the project would be distributed throughout the day, as the students generally “drop by” at varying hours of the day based on their class schedule. The 20 spaces to the students would not all be filled at the same time due to the fact that students’ class schedules are distributed throughout the day.

N-38

Please refer to EIR Section 4.8.3.1(a) for the construction noise analysis conducted for the Phase 1/Phase 2 project. As stated therein, pursuant to the City’s Noise Ordinance, temporary construction noise that exceeds 75 dB(A) L_{eq} at a sensitive receptor would be considered significant.

For a worst-case analysis, it was assumed that all the equipment listed in Table 4.8-3 of the EIR would operate simultaneously. As shown, the worst-case average hourly noise level at 100 feet would be 73.8 dB(A) L_{eq(1h)}—Grading would occur over the entire site and would not be situated at any one location for a long period. Therefore, the acoustic center of the construction activity was assumed to be the center of the vacant site. Neighboring uses are more than 100 feet from the center of the vacant site. Therefore, construction noise levels at the neighboring residences are projected to be within City standards and impacts would be less than significant.
N-40 *The DEIR fails to address noise impacts on neighborhood homes. Noise projections are primarily about how traffic noise will affect the interior of the Hillel facility -- not how the interior and courtyard and 2nd floor patio noise will impact the residences. As some music and gatherings from within the campus are occasionally audible within neighborhood streets, certainly the 100-feet-front-center distance poses in the noise study will not protect nearby houses from intrusive noises at this very close distance.

N-41 *Regarding Ordinance 1510 (304(h)(4)), the proposed Student Center does not provide setbacks similar to neighborhood homes, for which only garage setbacks are the 10 feet provided by Hillel; neighborhood houses themselves are set back from property lines an additional 20 feet.

N-42 *Scenic Drive North already presents a barely passable space for cars simultaneously turning left onto Cliffridge and those turning right from Cliffridge onto Scenic Drive N. Two feet less will create a greater hazard, with or without a stop-sign at that corner. Residents are most vulnerable given that they regularly use that turning on the way in and out of the neighborhood. But students seeking parking spaces for Hillel but also for access to the University, as well as people from around the city who seek parking for the campus theaters, will also be endangered. Adding to the hazard is the proposed hardscape put aside for Hillel office parking combined with the proposed two-foot street vacation. These narrow the turning space onto Cliffridge (or from Cliffridge onto LJ Scenic Drive North) and narrows the safety margin available for two-way traffic on La Jolla Scenic Drive North which is already tight and hazardous. Parked cars on both sides of the streets further impact this area.

N-43 *With regard to 8976 Cliffridge Avenue, what exactly does Hillel have in mind by “returning to private home status?” Is it their intention to use it for a Hillel staff member, thus maintaining it as a de facto part of the overall institutional use? If that is not their intention, then why go to the expense of closing the cul de sac with new hardscape, etc., for just the time required to build the project?

N-44 *The DEIR does not explain how the public would be able to use the landscaped “park” space made available to Hillel by a paper street vacation. If it is not truly “open space” or a “park” and is not suitable or made available on an ongoing basis for public use (by neighborhood residents) then how is the paper vacation justified?

N-41 The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all
relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City's Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

See response to comment N-5.

As detailed in EIR Section 3.4.2.1(f):

The northwestern portion of the site where the existing cul-de-sac is located would also be landscaped with native and drought-tolerant trees, shrubs, and groundcover to create a park-like amenity. A meandering bike path would be constructed in this area leading from La Jolla Scenic Drive North to Torrey Pines Road/La Jolla Village Drive. Either side of the proposed bicycle and pedestrian pathway would also be landscaped. A three-seat bench, trash receptacle, and drinking fountain would be located to the side of the bike path, and bike path signs would be installed at the north and south ends of the path, in accordance with the LJSPD signage guidelines.

This area would be available for any member of the general public to use. The applicant has proposed findings for the ROW vacation. As detailed in Section 125.0941 of the Municipal Code, the decision maker (in this case, the City Council) ultimately decides if the findings for the ROW vacation are met.
As detailed in Section 3.1 of the EIR, one of the project objectives is to “contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.” The Phase 1/Phase 2 project meets this objective.

As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.
Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose "... is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
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<tr>
<td><strong>O-3</strong></td>
<td>See response to comment O-2.</td>
</tr>
<tr>
<td><strong>O-4</strong></td>
<td>Any specific request or coordination made in 1977 does not have any bearing on the proposed project. This comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response is required.</td>
</tr>
<tr>
<td><strong>O-5</strong></td>
<td>See response to comment O-1.</td>
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<tr>
<td><strong>O-6</strong></td>
<td>As detailed in Section 3.0 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” The Hillel staff at the Cliffridge property support the religious programs for Hillel, including helping students plan programming for their religious life, developing religious events and trips, and fundraising for the students to do their religious work. Students visit the Cliffridge property for religious meetings and counseling, and to coordinate different aspects of Jewish life on campus. The kitchen at the Cliffridge property is used to prepare traditional religious dishes or traditional religious meals during religious holidays, and to teach students how to prepare these meals. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the LJSPD Ordinance. Further, under the Phase 1/Phase 2 project, the temporary use of the Cliffridge property would expire upon completion of the project, and revert back to a single dwelling unit use.</td>
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<td><strong>O-7</strong></td>
<td>As an alternative to the proposed Phase 1/Phase 2 project, the Existing with Improvements Alternative is analyzed in detail in Section 9.2.1 of the FEIR. If the Phase 1/Phase 2 project is not approved, Hillel would permanently use the Cliffridge property to provide for religious programs for Jewish students at UCSD. Therefore, under the Existing with Improvements Alternative the site would be used primarily for religious purposes. This is an allowable use in the Single-Family Zone, in accordance with the LJSPD Ordinance.</td>
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<td><strong>O-7</strong></td>
<td>With respect to the reduction of the width of La Jolla Scenic Drive North, the proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically...</td>
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to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

As detailed in EIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the traffic impact analysis did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate LOS are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. See EIR Table 4.2-8.
A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

O-8

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for "[c]hurches and places of religious assembly." This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being "seats," "pew space," and/or "assembly area." The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

O-9

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities
surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 people). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the
LETTER

the environmental issues that would need to be dealt with are not as significant as the draft EIR suggests. This site deserves more serious consideration.

Thank you for providing me with the opportunity to comment on the draft EIR.

Sincerely,

Richard Antiyev

RESPONSE

O-12 As detailed in EIR Section 9.2.4, the Site 675 Alternative has access constraints and would not reduce physical impacts to the environment when compared to the Phase 1/Phase 2 project, including to biological resources. See also response to comment O-11.
The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.
Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a]), specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

As detailed in EIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation
assumed for the project, the traffic impact analysis did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate LOS are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. See EIR Table 4.2-8.

A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

As detailed in EIR Section 4.2.5.1(a), La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. According to the City’s Street Design Manual, Local Streets (residential streets) are required to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards. The corners and radius would also conform to City standards. Overall, the Phase 1/Phase 2 project would result in a less than significant impact related to traffic safety.
<table>
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<tr>
<th>LETTER</th>
<th>RESPONSE</th>
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<td>Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “churches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.</td>
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As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities. |

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. |
Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.
With respect to noise, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m., and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. While additional visitors could be located within structures, the on-site noise sources anticipated from the project site would include activities at the courtyard and patios. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices within these exterior areas, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.

With respect to the Existing with Improvements Alternative, Hillel would permanently use the existing Cliffride. The Noise Report prepared for the project (EIR Appendix G) based the evaluation of this alternative on a maximum of 50 speaking voices. EIR Section 9.2.1 concludes that noise related to on-site uses for the Existing with Improvements Alternative would be consistent with existing measured noise levels, and therefore would not be significant when compared to existing and future traffic noise levels.

Sections 4.8.3.1 and 4.8.3.2 have been revised to include a brief discussion of potential noise impacts associated with anticipated special events at the Hillel facility that could attract more than the general daily average amount of visitors. It was determined that impacts would be less than significant.
Q-1 This comment is an introduction to comments that follow. No further response is required.
The recirculated EIR (December 2013) revised this section to include the word “primarily.” The section reads: “According to the LJSPD Ordinance, ‘churches, temples, or buildings of a permanent nature, used primarily for religious purposes’ are permitted uses within residential zones (Municipal Code Section 1510.0303(e) [Single-Family Zone – Permitted Uses]).”

Q-3 See response to comment Q-2.

Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose “. . . is to provide for the religious needs of Jewish students on the university campuses in San Diego County.” Hillel endeavors to build a strong sense of belonging and Jewish identity among UCSD students and to develop a culture infused by Jewish values.

As detailed in Section 3.2.2 of the recirculated EIR (dated December 2013), the Phase 1/Phase 2 project would be used primarily for religious purposes, with a variety of religious programs such as meditation and prayer circles, programs relating to observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel as the Jewish homeland, and other Jewish religious, cultural, and social interactions. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. These activities demonstrate that the project entails a facility that would be used primarily for religious purposes.

Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.
Q-4 (cont.)

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

Q-5

Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “... is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
West of the project site, across Torrey Pines Road, lies vacant land that is planned and permitted for institutional uses (owned by UCSD).

It should also be noted that the baseline physical conditions, or environmental setting, are detailed as they existed when the NOP was issued (2010); there was no ongoing construction at that time.

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

See response to comment R-2. The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

The Phase 1/Phase 2 project would generate a total of eight peak-hour trips. The City of San Diego does not require an analysis of roadways to which a project is forecasted to add less than 50 peak hour trips. Since the project would add less than this amount to Glenbrook Way and Cliffridge Avenue, an analysis of this roadway is not warranted. The other roadways mentioned by the commenter are included in the analysis within Section 4.2 of the EIR.
The traffic study accurately captures the physical environmental conditions with regards to traffic. As required under CEQA Guidelines Section 15125(a):

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published.

The NOP was published on October 8, 2010. Therefore, the baseline conditions are adequately described and the traffic study is not considered to be out of date.

Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.
The project entails a facility that would be used primarily for religious purposes, which is an allowable use in the Single-Family Zone of the La Jolla Shores Planned District. However, there is no requirement that setbacks for the project be “comparable to those of nearby religious institutions,” as the commenter states.

As detailed in EIR Section 4.1.4.1(a):

**Siting of Buildings:** Figure 4.1-1 shows the setbacks of Phase 1/Phase 2 as compared to surrounding structures. As detailed in Municipal Code Section 1510.0304(b)(1), “Buildings with openings (i.e., doors and/or windows) facing the side property line shall be constructed not closer than four feet from said property line.” As shown on Figure 4.1-1, the four-foot side yard setback would be adhered to at the northern frontage of the site.

The project site is not adjacent to a public park, and thus would comply with Municipal Code Section 1510.0304(b)(3). As detailed in Municipal Code Section 1510.0304(b)(4), “building and structure setbacks shall be in general conformity with those in the vicinity.” As shown in Figure 4.1-1, the approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

In addition, EIR Section 4.1.4.1(a) states:

The landscaping for Phase 2 (see Figures 3-10 and 3-11) would provide further organization of the site through selective placement of shade trees, flowering shrubs, and screening vegetation, and through the patterned provision of street trees along the north, east, and south street frontages. The street trees would be Torrey pines planted at regular intervals, thus maintaining continuity with the Torrey pines theme of the LJSPD area.
As detailed in Section 3.1 of the EIR, one of the project objectives is to “contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.” The Phase 1/Phase 2 project meets this objective. The southern portion of campus is preferred because of the close proximity to activities on campus. However, as detailed in Section 9.1 of the EIR, alternative locations were analyzed on more than just the south side of UCSD campus. No alternatives were rejected because they were not on the south side of campus. Existing public transit conditions are detailed in EIR Section 4.2.1.2(b).
The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

Potential traffic impacts under the Phase 1/Phase 2 project relating to adding trips to the street system are adequately analyzed in EIR Section 4.2.3.1(a). Potential traffic hazards under the Phase 1/Phase 2 project are adequately analyzed in EIR Section 4.2.5.1(a).

With respect to the narrowing of La Jolla Scenic Drive, the proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.
Section 4.12 of the EIR analyzes the visual effects associated with the Phase 1/Phase 2 project, including neighborhood character. This includes the organized appearance; height, bulk, and coverage consistency; varied visual environment; bulk and scale; and architectural style and building materials. As concluded, the Phase 1/Phase 2 project would not result in a significant visual impact.

As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California. Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.

We have lived in the La Jolla Highlands since 1968, first on Cliffridge Avenue and now on Glenwick Lane. We know this neighborhood very well and personally know many of its residents. It is one of only two neighborhoods that allow residents to...
Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional
**Letter**

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<tr>
<td>With regard to the project’s contribution to traffic and traffic safety,</td>
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<td>EIR Section 4.2 analyzed potential traffic hazards concluding that impacts</td>
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<td>would be less than significant.</td>
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<tr>
<td>Under the No Project Alternative and Existing with Improvements Alternative, no on-street parking spaces would be removed. There is no on-street parking in the vicinity of the Site 675 Alternative; therefore, no on-street parking spaces would be removed.</td>
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<td>The Reduced Project Footprint on Vacant Parcel Alternative would result in the same number of parking spaces removed as the proposed Phase 1/Phase 2 project</td>
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**LETTER**

walk to the Campus (or ride a bicycle). Here are our reasons for opposing the Center in the order of their importance:

| T-6 | We see the building of the UCSD Hillel Center for Jewish Life as the first step that will change the residential character of the neighborhood from owner-occupied family homes to a mixed neighborhood in which houses are torn down to make room of bigger common-use structures. The problem is that this Student Center has a totally different purpose and use than the single-family homes in this residential neighborhood. |
| T-7 | The crux of the matter is that the size, height and nature of the buildings are out of step with the rest of the neighborhood. A number of the residences have been remodeled and now have two stories. A few are quite modern looking. But, they clearly look like residences and are not multiple use buildings. |
| T-8 | The Traffic Impact Analysis (page 21) incorrectly assumes that 80% of people will walk and 20% will drive with 2 people per vehicle. To suggest that most students are going to walk to this building defies reality. I am well acquainted with the location of the residence halls on campus. Furthermore, many of the students live off-campus. It is highly likely therefore that a larger than predicted number of students will be using the neighborhood streets for parking, even though there is a two-hour limit (which is only sporadically enforced). |

I want to emphasize that we are not opposed to change if change is for the better. We have seen the Campus, La Jolla and San Diego change during the last 40 years and generally approve of those changes. But, we also recognize that we need to preserve those things that make this area and especially this neighborhood such a pleasant place to live. We therefore urge you not to approve the building of the Student Center, in spite of its appealing design and exhaustive environmental impact report.

Yours truly,
Maarten and Janet Chrispeels

**RESPONSE**

Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “...is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

With respect to the project changing the residential character of the neighborhood, see response to comment T-3.

The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to
other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

T-8 See response to comment T-2.
LETTER

Costello 3/11/2013 Page 1 of 3

From: Michael Costello
626 Wreton Dr.
La Jolla, CA 92037
emsnike@san.rr.com

To: Ms. E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS891
San Diego, CA 92101
DSDEAS@sandiego.gov

Subject: Draft EIR of the “UCSD Hillel Center For Jewish Life” for the UCSD Hillel Center for Jewish Life, Project No. 212995

Dear Ms. Shearer-Nguyen;

There are many omissions and errors in the DEIR. Please consider these points.

1. It is shocking how a proposed project with this many problems could be advanced thought the permit process. The sheer number of deviations or variances, the need to ignore so many parts of the SD Municipal Code, the La Jolla Community Plan, the La Jolla Shores PDO and the La Jolla Shores Design Manual, alterations of streets, right of way abandonment, indicates a poorly conceived project. The DEIR should have these all clearly tabulated for any reader.

2. The use of the Cliffridge property for an office in a single family residential zone is not legal and must be stopped. That is, Phase 1 must not be allowed. Additional parking spaces for an illegal use must not be allowed. All requirements for minimum landscaping and maximum hardscape must be observed for this single family zone.

3. The four findings for the Right-of-Way Vacation cannot be made.
   a) “public use” The street is currently used for on street parking by UCSD students. Often 18 to 20 cars can be seen legally parked at the site of the proposed Vacation.
   b) “public benefit” There will not be a public benefit. There will be a loss of on street parking and the loss of an area used by the SD City vehicles and equipment during public works projects.
   c) “land use plan” Long before the Hillel project was conceived, this land was designed to be open space as it was not suited for development. The change from open space was done for Hillel without a public hearing and is not valid. It should revert to the original planned use.
   d) “public facility … not detrimentally affected” Not only will on street parking be lost forever, but the associated narrowing of the street will cause

RESPONSE

U-1

As detailed in EIR Chapter 3, the Phase 1/Phase 2 project would require a temporary deviation from Municipal Code Section 142.0560 (Development and Design Regulations for Parking Facilities) to allow a 12-foot-wide curb cut until occupancy of Phase 2 occurs, and a deviation from parking requirements. The ROW vacation and narrowing of La Jolla Scenic Drive North have been integrated into the project design in order to provide a park-like amenity, contiguous sidewalk, and extensive landscaping.

The project’s deviation and compatibility with the Municipal Code, La Jolla Community Plan, LJSPDO, and La Jolla Shores Design Manual are adequately analyzed in EIR Section 4.1, Land Use. The street vacation of the existing La Jolla Scenic Drive cul-de-sac and narrowing of the width of that roadway are adequately analyzed in EIR Section 4.2.5.1(a), where it was determined that impacts would be less than significant.

U-2

Neither the Phase 1/Phase 2 project nor the Existing with Improvements Alternative is an office building, nor are they considered office uses. As discussed in Chapter 3, Project Description, the project entails a facility that would be used primarily for religious purposes, with space for religious learning, community-building, and spiritual counseling. This is an allowable use in the Single-Family Zone.

As detailed in Section 3.0 of the EIR, the Cliffridge property is currently used to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD in accordance with the Hillel Articles of Incorporation (see response to Comment K-24). The Hillel staff at the Cliffridge property support the religious programs for the organization. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the City Municipal Code. The comment correctly states that a deviation would be required for the additional six parking spaces; however, no deviation would be required for a reduction in landscape/increase in hardscape. The FEIR has been revised to remove reference to this deviation.

As discussed in EIR Section 4.1.3.1(a), during Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut, instead of a 24-foot-wide curb cut for the Phase 1 site. The
U-2 (cont.) temporary parking area would provide parking for Hillel staff members during Phase 1. The proposed deviation would not result in secondary environmental effects. A Residential High Occupancy Permit is not required for either the Phase 1/Phase 2 project or the Existing with Improvements Alternative, as neither involve a residential component. This type of permit is required for a single dwelling unit with six or more persons 18 years of age and older residing for 30 or more consecutive days (see Section 123.0502 of the Municipal Code).

The deviation required under Phase 1/Phase 2 is analyzed in EIR Section 4.1.3.1(a). As detailed therein, during Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut, instead of a 24-foot-wide curb cut for the Phase 1 site. The proposed deviation is temporary and would not result in secondary environmental effects, such as traffic safety impacts. The parking area with the 12-foot-wide curb cut would be used by Hillel staff members, during Phase 1. There would not be a significant amount of inbound or outbound traffic from the parking lot during this phase of the project (i.e., approximately 12–16 trips out of the parking area per day). The temporary use of the Cliffridge property will cease after occupancy of Phase 2, the Cliffridge property would return to residential use, and the 12-foot-wide driveway would be adequate. Thus, due to its temporary nature, this deviation would not result in significant direct or secondary environmental effects. Therefore, impacts would be less than significant.

No other deviation is required. The FEIR has been revised to remove reference to a deviation from minimum landscaping and maximum hardscape as that is not required for this project.

U-3 The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.
Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “...is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

The project consists of three individual structures around a central outdoor courtyard providing 6,479 square feet of gross floor area. As detailed in EIR Section 4.12.4, the Phase 1/Phase 2 project would have a less than significant impact related to neighborhood character, including bulk and scale compatibility, architectural style and building materials, community landmarks, and being located within a highly visible area.

Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “...is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a
LETTER

Costello 3/11/2013 Page 3 of 3

remove another 20 or so spaces. The project will simply not have enough parking and will have a deleterious impact on the Community.

Thank you for your consideration,

Michael Costello

RESPONSE

U-4b (cont.)

detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

U-5

As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that
adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.

With respect to noise, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m., and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. While additional visitors could be located within structures, the on-site noise sources anticipated from the project site would include activities at the courtyard and patios. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices within these exterior areas, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.

With respect to the Existing with Improvements Alternative, Hillel would permanently use the existing Cliffridge. The Noise Report prepared for the project (EIR Appendix G) based the evaluation of this alternative on a maximum of 50 speaking voices. EIR Section 9.2.1 concludes that noise related to on-site uses for the Existing with Improvements Alternative would be consistent with existing measured noise levels, and therefore would not be significant when compared to existing and future traffic noise levels.

Sections 4.8.3.1 and 4.8.3.2 have been revised to include a brief discussion of potential noise impacts associated with anticipated special events at the Hillel facility that could attract more than the general daily average amount of visitors. It was determined that impacts would be less than significant.
With respect to the issue of setbacks, the project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

With respect to the project’s consistency with the neighborhood character, the recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.
Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.
The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.
Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the
students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
LETTER

From: Andrea Dahlberg <adahlsberg@yahoo.com>
To: DSD 1AS
Cc: UCSD Hillel Center for Jewish Life Project No:212795 / SGN No: 2011-01310

Subject: RTC-137

Date: Saturday, March 02, 2013 6:25 PM

The draft Environmental Impact Report (EIR) for the UCSD Hillel Center for Jewish Life (212795) DOES NOT address the negative effects the project will have on the surrounding residential neighborhood due to increased traffic.

V-1

The neighborhood will be affected DAILY by the people coming to and from the Center. Hillel maintains that its attendees will take the bus or walk. However, as we see from students attending the university, patrons attending JJ Playhouse, persons attending the nearby temples -- almost everyone drives and parks in the neighborhood.

V-2

In fact, the parking traffic has gotten so bad that the increasing sections of the neighborhood have resorted to having 2-hour parking limits on their streets. In the past year, several more streets have opted for 2-hour parking restrictions. Unfortunately, all this does is push the traffic back to the few streets/oude-ssacs that do not have the 2-hour restriction.

V-3

The DEIR does not adequately address the increased traffic that will be imposed on the neighborhood -- nor does it address the increased traffic that is going to result from the Venture Institute. The Venture Institute is only going to allow right-hand turns when cars exit the facility. How are these cars going to get to the freeway? Either their going to make a u-turn at the Glenbrook light (which endangers pedestrians crossing the street) or they are going to go through the neighborhood.

V-4

Just a couple months ago, a biker was hit by a car as the biker crossed Torrey Pines in the cross walk. The car just blew through the red light and was totally at fault. Both the Venture Institute and Hillel are only going to add more traffic to the area and make it more unsafe.

Please listen to the neighbors. We do not support construction of any building on the site.

Andrea Dahlberg
8060 Cliffside Ave
La Jolla, CA 92037

RESPONSE

V-1

As detailed in EIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2.4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the traffic impact analysis did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate LOS are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. See EIR Table 4.2.8.

V-2

This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.
The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

See response to comment V3. Trip generation and traffic hazards associated with the Phase 1/Phase 2 project are adequately analyzed in Section 4.2.5.1(a).
**LETTER**

From:
Gail Forbes <gailforbes8@gmail.com>

Sent:
Sunday, March 10, 2013 11:45 PM

To:
OSIR SAS

Cc:
Maria S Rothchick; Mary Geklecy

Subject:
UCSD Hillel Center for Jewish Life Project #212995 SCD No 201010130

Response to the Draft Environmental Impact Report for the UCSD Hillel Center for Jewish Life Project #212995, SCD No 201010130

March 9, 2013

Comments On:

8.0 Executive Summary
- The extensive use of Acronyms is a shorthand for the titles of various Regulations and Agencies (NCCP, BMP, MIPA, CDIG, ADT) is overwhelming to a non-expert. Although convenient for the writer, it is confusing for interested citizens reading this lengthy document. Every once in a while, the full title should be used in the text rather than the acronym.

It is also difficult to determine how to comment on the document. Many of the numbered sections describe and confirm conclusions, and then separate sections reiterate those conclusions or opinions, which a citizen may wish to refute. Little guidance is provided for the interested citizens whether to attempt to respond to every mention of an issue, if he or she disagree with the method, fact, or conclusion, or only the first instance of error or disputed conclusion. Also, the pagination of the report, its length, makes copying portions for study and reflection very difficult.

Summary -

8.1 1 Location & Setting
- The confusion created by the similarity of street names: La Jolla Scenic Way, and La Jolla Scenic Drive North should be more fully described. Road names are further complicated by the name La Jolla Scenic Drive South which lies a mile away but is often referred to as La Jolla Scenic. The sharp deviation of La Jolla Scenic Drive North, its abrupt and as a partial exit, the unusual of the traffic load by La Jolla Scenic Way, leads to the misidentification of one, for the other.

8.3 Controversy - also 3.6.1 History of the Project also 6.0 Growth Indicators also 8.5 Parks and Rec
- The circumstances of the sale are not described. Prior to the unexpected and exclusive sale of this property by the City of San Diego, the parcel was designated Open Space on maps of the City of San Diego, and recognized as such by residents of the La Jolla Shores Planned District.

Many citizens believed that under City Law, the parcel was Public Land and could not be sold except as approved by a vote of the citizens. The conversion of the land from Open Space to a sold parcel, is itself a significant environmental change. Prior to 2000, the hopes of the surrounding neighborhood were that the parcel would develop into a park or recreational oasis near a busy intersection. The neighborhood began improvements on the parcel to further those goals. They planted trees on the parcel. Volunteers cared and monitored the plantings, until they were removed by people, or parties unknown.

There was also a sense of outrage to discover that a single family residence had been converted to office space, without a permit or public hearing. Neighborhood Code Compliance and the City attorney refused to force compliance to the La Jolla Shores Planned District Ordinance. Such dereliction compounded the dismissive and

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<tr>
<td>W-1</td>
<td>Each acronym used in the EIR is spelled out upon first citation, and a full list of acronyms is located in the EIR after the Table of Contents. This is consistent with the City’s EIR guidelines.</td>
</tr>
<tr>
<td>W-2</td>
<td>An EIR is required to contain the information outlined in Sections 15120 to 15132 of the CEQA Guidelines. The EIR contains this required information. In particular, the EIR contains a Table of Contents, which provides the page number of each EIR section, figure, and table, as well as other helpful information. The EIR has been prepared in accordance with CEQA requirements.</td>
</tr>
<tr>
<td>W-3</td>
<td>The names of roadways within the project vicinity are fully spelled out consistently through the EIR and are correctly used.</td>
</tr>
<tr>
<td>W-4</td>
<td>EIR Section 3.6.1 states: Site 653 was also evaluated for potential incorporation into the City’s Park and Recreation Department’s open space inventory in November 2000. As detailed in a City memo from the Director of the Park and Recreation Department (McLatchy 2000), the parcel did not meet the City’s definition as an open space parcel, as it is “completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value.” Section 3.6.1 also states: “In 1999, at the request of Hillel, the City issued a request for proposals for potential sale of the 0.8-acre vacant site historically referred to as Site 653. In 2000, Hillel responded to the request and was awarded exclusive negotiating rights to purchase the site after a public hearing.” An EIR is not required to evaluate the sale of land or any other action that does not involve physical impacts to the environment.</td>
</tr>
<tr>
<td>W-6</td>
<td>There is no such requirement and the commenter does not provide evidence of such requirement. The project site is owned by Hillel.</td>
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RTC-139
The comment regarding neighborhood actions will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Neither the Phase 1/Phase 2 project nor the Existing with Improvements Alternative is an office building, nor are they considered office uses. As discussed in Chapter 3, Project Description, the project entails a facility that would be used primarily for religious purposes, with space for religious learning, community-building, and spiritual counseling. This is an allowable use in the Single Family Zone.

As detailed in Section 3.0 of the EIR, the Cliffridge property is currently used to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD in accordance with the Hillel Articles of Incorporation (see response to Comment K-24). The Hillel staff at the Cliffridge property support the religious programs for the organization. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the City Municipal Code. The comment correctly states that a deviation would be required for the additional six parking spaces; however, a deviation is not required for a reduction in landscape/increase in hardscape. Reference to such a deviation has been removed from the FEIR.

As discussed in EIR Section 4.1.3.1(a), during Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut, instead of a 24-foot-wide curb cut for the Phase 1 site. The temporary parking area would provide parking for Hillel staff members during Phase 1. The proposed deviation would not result in secondary environmental effects. A Residential High Occupancy Permit is not required for either the Phase 1/Phase 2 project or the Existing with Improvements Alternative, as neither involve a residential component. This type of permit is required for a single dwelling unit with six or more persons 18 years of age and older residing for 30 or more consecutive days (see Section 123.0502 of the Municipal Code).
The No Project Alternative was adequately analyzed in compliance with CEQA. There is no legal requirement to assess what the parcel could be used for by another owner. See response to comment W-4 regarding the use of the vacant site as open space.

The parcel could not be used for mitigation or habitat credits as it is an entirely urbanized area, with no connectivity to established wildlife corridors.

Baseline physical conditions, or environmental setting, are detailed as they existed when the NOP was issued (2010); there was no ongoing construction at this location at that time. Nonetheless, the recirculated EIR (December 2013) was revised to indicate that property west of the project site, across Torrey Pines Road, is planned and permitted for institutional uses (owned by UCSD).

The proposed project does not contain natural habitat, is not located within the MHPA, and is isolated from MHPA lands. The project’s potential to impact biological resources is fully addressed in EIR Section 4.3, and concludes that impacts to biological resources would be less than significant.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a]), specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.
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<th>LETTER</th>
<th>RESPONSE</th>
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<tr>
<td>W-10</td>
<td>As detailed in EIR Section 4.2.1.2(a):</td>
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<td>Based on field observations, there are currently Class II bicycle facilities provided along La Jolla Village Drive and Torrey Pines Road within the study area. However, no bicycle facilities are provided along La Jolla Scenic Way and La Jolla Scenic Drive.</td>
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<td>The project would not conflict with existing bicycle facilities, nor would it interfere with any potential future bike facilities. The project would enhance the pedestrian and bicycle facilities adjacent to the project site. For example, as detailed in Chapter 3:</td>
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<td>For Phase 2, the existing driveway from the cul-de-sac portion of La Jolla Scenic Drive North to the Cliffridge property would be relocated. This would allow for construction of sidewalks and landscaping features in place of the cul-de-sac. The existing stop sign on Cliffridge Avenue at La Jolla Scenic Drive North would be removed, and a new left/curve sign installed on La Jolla Scenic Drive North. Phase 1/Phase 2 proposes to narrow La Jolla Scenic Drive North by two feet to 34 feet in order to provide for a 12-foot parkway on the north side of the roadway with increased landscaping. At 34 feet wide, La Jolla Scenic Drive North would still conform to City traffic standards and street design requirements. A strip along the property frontage of La Jolla Scenic Drive would be dedicated to the public right-of-way.</td>
</tr>
<tr>
<td>W-11</td>
<td>The project site is not an “open space parcel.” The project is required to be analyzed against the baseline conditions when the NOP was issued, which was in 2010. The Biological Technical Report was prepared in accordance with the City’s Biology Guidelines (2000). The biology report and EIR adequately details the relevant regulatory framework related to biological resources, including the MSCP.</td>
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<tr>
<td>W-12</td>
<td>The project’s Biological Technical Report was prepared following City guidelines and requirements for surveys and evaluation of avian wildlife. As disclosed in EIR Section 4.3.1.4, Cooper’s hawk, a sensitive raptor species recognized by CDFW, and migratory and breeding birds have potential to nest on and adjacent to the project site. EIR Section 4.3.3.2 goes on to state that the existing eucalyptus...</td>
</tr>
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trees on-site have the potential to support Cooper's hawk, a CDFW species of special concern. Because clearing and construction activities associated with Phase 1/Phase 2 could be disruptive to raptors including Cooper's hawk and breeding or nesting birds, direct and indirect construction project impacts would be significant. Therefore, mitigation in the form of pre-construction surveys, as detailed in Section 4.3.3.3, would reduce impacts to a less than significant level.

The EIR details the mitigation required for the protection of raptors and/or any native/migratory birds during their breeding season. Mitigation is not required for the loss of the communities found on-site, Disturbed (Tier IV habitat) and developed lands (no Tier), as they are not considered sensitive. Thus, impacts would be less than significant.

The project would be required to comply with glare regulations. Window glazing associated with the project would contribute to the LEED designation sought by the project, but does not refer to making the windows more reflective. Furthermore, Figures 3-12 and 3-13 show the architectural design of the project. Most windows are obscured by overhang, landscaping, or screening walls. Therefore, the project would reduce the likelihood of bird and window collisions.

It is acknowledged that there is MHPA land in the vicinity of the project site. These MHPA lands do not have identifying name or numbers to refer to. The proposed project is not located within nor adjacent to the MHPA, and is isolated from MHPA lands.

The vacant project site does not, nor does it have the potential to, serve as a valuable wildlife corridor due to the highly urbanized nature of its location.

As detailed in Section 4.2.1.5(c):

One of the primary objectives of the MSCP is to identify and maintain a preserve system which allows for animals and plants to exist at both the local and regional levels. The MSCP has identified large blocks of native habitat having the ability to support a diversity of plant and animal life known as "core biological resource
areas.” “Linkages” between these core areas provide for wildlife movement. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. Input from responsible agencies and other interested participants resulted in creation of the City’s MHPA. The MHPA is the area within which the permanent MSCP preserve would be assembled and managed for its biological resources.

As previously detailed, the project site is not located within the MHPA. Please also see the responses to comments W-3 and W-6.
The EIR adequately discusses a reasonable range of alternatives as required under CEQA. The scope of this comment is beyond the required contents of the EIR and does not raise any substantive issues related to the adequacy or accuracy of the EIR. No additional response is required.

The Biological Technical Report was prepared in accordance with the City's Biology Guidelines (2000). The biology report and EIR adequately details the relevant regulatory framework related to biological resources, including the MSCP.

As detailed in EIR Section 4.3, a general biological survey site visit was conducted for the vacant portion of the project site in May 2013 to update fieldwork conducted in 2010, 2007, and 2003. The project site is composed of disturbed (Tier IV) and developed lands. Furthermore, there is no mimosa mound topography that typically characterizes the formation of vernal pools. Thus, no vernal pools were observed during any of the surveys nor is there potential for them to occur as the site does not contain the appropriate conditions.

Since the circulation of the EIR, an updated biological survey has been performed (see Appendix C-2). Additionally, EIR Section 4.3 has been updated to reflect that the new survey did not reveal any new or changed biological circumstances within the project site.

Flora and fauna studies were conducted in accordance with the City's Biology Guidelines and conclusions are included in the Biological Technical Report prepared for the project and Section 4.3 of the EIR. See response to comment W-18.
<table>
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<th>LETTER</th>
<th>RESPONSE</th>
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<td>Low rainfall conditions would not support the formation of a vernal pool. Other than a statement that no vernal pools exist, there is no mention whether the soil and topography were evaluated for the formation of a vernal pool. The infrequency of dates of survey and their seasonality, result in less than adequate observation for the formation of vernal pools above the hardpan. The report does not mention that a site-specific survey was performed for the presence of a vernal pool, nor any historical review conducted. The US Fish and Wildlife recovery plan for the San Diego Fairy Shrimp noted that historical distributions of vernal pool species can be reconstructed and the landscape restored sufficiently to allow for the reestablishment and expansion of populations, where necessary (Service 1998a, p. 71).</td>
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W-20 This section of the EIR has been revised to state the following:

> Energy consumption rates specific to a religious facility of this type were not available. For the purposes of this analysis, it was assumed that the energy consumption for Phase 1/Phase 2 was based on educational uses because it is the closest available data type to the proposed use.

Thus, throughout the analysis in EIR Sections 4.5 and 4.6, the closest available data type to the proposed use was selected. This does not change the underlying use of the project, which would be primarily for religious purposes.

W-21 On-site generated noise in relation to the Phase 1/Phase 2 project is analyzed in EIR Section 4.8.3.1(a). On-site noise sources analyzed in this section include activities at the courtyard and patio. These activities would typically consist of conversations, meetings, and general social gatherings. Section 4.8.3.1(a) of the EIR also analyzed noise levels on the rare occasions that the facility would host larger gatherings. This section analyzed noise due to HVAC units as well. Based on the City’s threshold of significance, noise generated by the project was determined to be less than significant.

W-22 The project does not have any occupancy component and is not a fraternity/sorority house or mini-dorm. The project consists of a facility that would be used primarily for religious purposes. This is an allowable use in the Single-Family Zone. The EIR analyzes the potential for “precedent setting” in Section 6.3.

W-23 The Existing with Improvements Alternative does not require a deviation from maximum paving and hardscape requirements. The FEIR has been revised to remove any reference to this deviation. Furthermore, under either the Existing with Improvements Alternative or Phase 1/Phase 2 project, no person would stay overnight at the facility.

W-24 The Final EIR has been revised to include the word “not.”
As required by CEQA Guidelines Section 15126.2(d), an EIR must include a discussion of the ways in which a proposed project could directly or indirectly foster economic development or population growth, and how that growth would affect the surrounding environment. Growth can be induced in a number of ways, including the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of the “removal of obstacles to growth” relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval. According to CEQA Guidelines Section 15126.2(d), "it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment." Adverse impacts are assessed not directly under growth inducement, but throughout the subject areas for which ways growth inducement associated with the proposed project would result in significant adverse environmental impacts. The CEQA Guidelines require a discussion of growth inducement, but not speculation as to when, where and what form growth may occur, as such speculation does not provide the reader with accurate or useful information about the project’s potential effects. EIR Sections 6.1 and 6.2 adequately analyze the project’s potential to induce growth in accordance with the CEQA Guidelines.
X-1

The initial portion of this comment represents the commenter's opinion and does not relate to the substance or adequacy of the EIR. With respect to potential impacts associated with the project, potential physical impacts for the project are adequately analyzed in EIR. Specifically, impacts associated with traffic and parking (EIR Section 4.2), noise (EIR Section 4.8), and lighting (EIR Section 4.12) were analyzed and determined to be less than significant. Commotion and food deliveries are not per se CEQA issues; however, they would be included in the evaluation of noise and traffic, respectively.

Hillel was incorporated in the State of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose "... is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
The project entails a permanent facility used primarily for religious purposes. We understand that UCSD has told Hillel in the past that Hillel cannot have permanent or long-term space or use on campus. The commenter has not pointed to any available space on campus that UCSD is planning to sell or lease for long-term use. Absent available space that UCSD is willing to sell or lease to Hillel, the project cannot be located on campus. Further, there has been no showing that locating the project on campus would avoid or substantially lessen significant effects of the project, as is required for an alternative locations analysis. See EIR Section 9.1 for a discussion of the alternative locations considered for the project. Additionally, Hillel owns the project site. There is no requirement that Hillel forego use of the project site that it already owns to satisfy a commenter’s subjective preference that the project be located on the UCSD campus.

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.
Patricia Granger
8854 Robin Hood Lane
La Jolla, CA 92037
858 445-0441
patgranger@uiojol.com

E. Shearer-Nguyen, Environmental Planner
City of San Diego, Development Service Center
1222 First Avenue MS 501
San Diego
CA 92101
DSDEAN@sandiego.gov

Subject: UCSD Hillel Center for Jewish Life, Project No. 212995

Date: March 8, 2013

Dear Ms. Shearer-Nguyen,

I am sending my comments on the D EIR both by e-mail and US POSTAL SERVICE. The hard copies will have documents attached.

Please could you please confirm you received this information?

Best regards,
Patricia Granger
Z-1a The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

Z-1b The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

Z-2 See response to comment Z-1b.
The project would provide adequate parking for visitors to the project site. Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for "[c]hurches and places of religious assembly." This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being "seats," "pew space," and/or "assembly area." The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 drive alone).
### LETTER

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Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

Additionally, as detailed in EIR Section 3.4.2.1, as provided as conditions of project approval, Hillel’s regular hours of operation would be Monday through Friday from 9:00 a.m. to 10:00 p.m. Generally, the facility would only be open during the evenings and on weekends if there is a special event planned and in that case a Parking Management Plan would be utilized to assure adequate parking.

### RESPONSE

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With respect to the project’s hours of operation, see response to comment Z-3.

With respect to the narrowing of La Jolla Scenic Drive, the proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking).
La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.
June 21, 1977

Property Department - Attention: John Ryan
Engineering and Development Department

Proposed Sale or Lease - Portion of Pueblo Lot 1299

We have no objection to the sale or lease of this property. However, it should be pointed out that access to the property is limited to La Jolla Scenic Drive only.

Division Superintendent

EXHIBIT 1 (5 pages, including 3 references to the waiver of access from La Jolla Scenic Way, comments from Senior Planner Stephen concerning a previous attempt to develop the parcel in 1983, and a summary of dedications of named properties and streets).
LETTER

May 27, 1977

SAC (Distribution)
Property Department

Proposed Sale or Lease - Port. of Pueblo Lot 1236

The City-owned land marked in red on the attached drawings, containing approximately 0.10 Acres (4356 square feet) is being investigated to determine its availability for sale or lease. The current zoning within the La Jolla Shores Planned District regulations is single family.

We request that you indicate any objections you may have to the disposal of this property. If you have comments to make, please indicate your name and department. No reply will be taken to mean no objection.

If present or future needs require that certain rights be retained, please indicate their nature and precise location within the boundaries of subject property.

Thank you.

[Signature]
John Ryan
Property Department

RECEIVED
JUN 7 1977
PROPERTY DEPT.

Because of its location and size, it is not suitable for development. The City should retain ownership and maintain it as a landscaped traffic island.

Michael Stepner
Senior Planner
Planning Dept. Ph 5273

RESPONSE
October 1, 1980

To: The City Council of San Diego

From: La Jolla Shores Association

RE: Density Review For Major Properties Located Within The
The La Jolla Shores Precise Plan District

Ladies and Gentlemen:

In response to the request of the City Council, the La Jolla Shores Association has reviewed the seven major parcels of land that remain undeveloped within the jurisdiction of the Association.

The purpose of the review was to recommend to the City Council densities for each of these parcels.

The Association is aware of the City's policy of infill, and this factor was taken into consideration during our review. While this policy, which results in urbanization, is generally accepted, the residents of La Jolla Shores are firm in their resolve to maintain the existing character and density of the community. To achieve this goal, the presently vacant parcels can only be developed with a use and density similar to that of existing adjacent land. This continuity is vital to the environmental preservation of one of San Diego's most unique communities.

Similarly as the remaining vacant parcels are unusual and unique in configuration and topography, we have concluded that how the property is developed is as important as the density, and therefore recommend that all seven parcels be controlled by a review process similar to that of a PDR.

Here are the seven properties and our recommendations: (Please refer to the attached for Assessor's Parcel Number, ownership and location within the district.)

Property #1: 5.66 Acres, no change from existing La Jolla Shores Precise Plan. Traffic flow and topography concerns were a consideration when reviewing this property.

Property #2: 6.0 Acres, we recommend an increase in density to 53 units or 8.7 units per acre. Topography and existing density in the neighboring property were factors in this decision.
October 1, 1980
City Council of San Diego
Page Two

Property #3: 3.4 Acres, no change from existing La Jolla Shores
Precise Plan. Topography was the prime consideration
on this property.

Property #4: .32 Acres, this property to become landscaped open
spaces. Traffic and location were the prime factors
in the property.

Property #5: 1.84 Acres, no change from existing zone (1 unit per
20,000 square feet?). Topography was the prime con-
sideration.

Property #6: 2.85 Acres, no change from existing zone (1 unit per
20,000 square feet?). Topography was the prime con-
sideration.

Property #7: 7.88 Acres, increase density to a total of 40 units.
If an existing street right-of-way is abandoned, the
density should then be increased to a total of 30 units.
Topography and contiguous land use were primary factors.

Members of the La Jolla Shores Association will be present at
a public hearing to review in detail each of these properties and
answer any questions that the City Council may have.

Sincerely,

Mark W. Steele
Chairman of the La Jolla Shores Association Planning Committee
With respect to the required ROW Findings, the City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

With respect to narrowing the roadway, see response to comment Z-4.

With respect to removing cul-de-sac, vehicles may currently use the La Jolla Scenic Drive North cul-de-sac as a turnaround area. As shown in Figure 4.2-2 during the AM peak hour (highest hour between 7-9 a.m.), no vehicles turned into the cul-de-sac from La Jolla Scenic Drive North, and only two vehicles turned into the cul-de-sac from Cliffridge Avenue. Only seven vehicles turned into the cul-de-sac during the PM peak hour (highest hour between 4-6 p.m.).

Phase 1/Phase 2 would vacate the westerly cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. The vacation of the street right-of-way and street reconfiguration will provide pedestrian improvements at this location.
The project is called the “Hillel Center for Jewish Life.” The variation of the previous project titles does not change the fact that the project would be used primarily for religious purposes, which is an allowable use in the Single-Family Zone within the LJSPDO.

Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “…is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
January 11, 2001

Ms. Pat Granger
8854 Robin Hood Lane
La Jolla, CA 92037

Dear Ms. Granger:

Subject: City Site 653

This letter is prepared at the direction of the City Manager's office in response to your appearance at the City Council meeting of November 27, 2000. During the public comment portion of that meeting, you raised concerns relating to the City's proposed sale of Site 653 located on La Jolla Scenic Drive and requested information relating to how the City would accommodate citizen input relating to future uses of this property. This letter responds to your questions.

Site 653 is a triangular piece of property, totaling approximately 0.258 acres (11,238 square feet) generally located at the intersection of La Jolla Village Drive, La Jolla Scenic Way and La Jolla Scenic Drive North. The property is in the La Jolla Shores Planned District and is zoned "SF", which permits single family residential development. The City, on November 20, 2000, entered into exclusive negotiations with the Hillel Foundation of San Diego for the lease of the property. Although some preliminary discussions have taken place between the Hillel Foundation and City staff relating to the potential use of this property as a center for Jewish students, no plans have been submitted to the City by the Hillel Foundation for the development of this site as of this date.

Prior to any development taking place on this property, a "Site Development Permit" would be required. A Site Development Permit is a discretionary action by the City which requires a public hearing. Prior to a public hearing being scheduled, the City forwards copies of plans received for the development to the Community Group for their review and input. The City additionally twice notifies persons living or owning property within 300 feet before a public hearing to consider the project is conducted.

Because the City has received no plans for the development of this site, we cannot anticipate what impacts could occur as a result of the use of this site as a student center. Should an application be received, part of the review the City would conduct on such an application would...
Ms. Pat Granger
January 11, 2001

be to examine both parking on site and circulation impacts as a result of the development of this site on the adjacent streets and the area surrounding this property. With respect to parking associated with the UCSD campus; the college is a State entity and the City has no control as to the development which takes place on the campus. The City is aware however, that UCSD campus planners are developing a long-range transportation / parking plan. The City has been informed that this plan will include increased linkages to public transit as well as the development of a new on-campus parking structure.

Thank you for your interest in this matter. If you or others have questions about the information contained in this letter, or if you would like to be kept informed of the status of future plans which may be submitted to the City on this property, please contact Gary Geiler of our staff at (619) 446-5366.

Sincerely,

Robert Diclon
Program Manager

RWD/gwg

cc: Mike Ubertina, City Manager
Tina Christiansen, Director, Development Review
Stephen Haase, Assistant Director, Development Review
Shariar Afshar, Property Agent, Real Estate Assets
Ed Flans, Council Liaison
Alison Glennon, AIM Tracking System Coordinator
Gary Geiler, Associate Planner

RTC-168
DEVELOPMENT SERVICES DEPARTMENT  
Date of Notice: October 8, 2010

PUBLIC NOTICE OF THE PREPARATION OF A  
ENVIRONMENTAL IMPACT REPORT  
AND  
PUBLIC NOTICE OF AN ENVIRONMENTAL IMPACT REPORT  
SCOPING MEETING  
TC: 24009258

PUBLIC NOTICE: The City of San Diego as the Lead Agency has determined that the project described below will require the preparation of an Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a Project Environmental Impact Report and Scoping Meeting was publicly notified and distributed on October 8, 2010. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego website at the following location on October 8, 2010, https://www.sandiego.gov/departments/environment/ceqa.html.

SCOPING MEETING: A public scoping meeting will be held by the City of San Diego Development Services Department on Wednesday, October 27, starting at 5:30 PM and running no later than 7:00 PM at La Jolla Branch Library, 7555 Draper Avenue La Jolla, CA 92037. Please note that depending on the number of attendees, the meeting could end earlier than 7:00 PM. Verbal and written comments regarding the scope and alternatives of the proposed EIR will be accepted at the meeting.

Written/Mail-in comments may also be sent to Elizabeth Shearer-Nguyen, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101, or e-mailed to EOSPLA@sandiego.gov referencing the Project Name (Hillel Student Center of San Diego) and Number (21289258) in the subject line within 30 days of the receipt of this notice/distribution. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. An EIR incorporating public input will then be prepared and distributed for public review and comment.

PROJECT NAME/NO: HILLEL STUDENT CENTER OF SAN DIEGO (21289258)

COMMUNITY PLAN AREA: La Jolla

COUNCIL DISTRICT: 1 (Lightner)

PROJECT DESCRIPTION: The Applicant is requesting a SITE DEVELOPMENT PERMIT AND PUBLIC RIGHT-OF-WAY VACATION for the phased construction of two one-story buildings and one two-story building around a central outdoor courtyard space, a surface parking lot, and a landscaped area. The project proposes to be accomplished in two phases as Hillel is currently occupying an existing on-site single family house. Phase I would consist of the continued operation of religious administrative offices in the existing single family residence located at 8975 Cliffridge Avenue on an approximately 0.5-acre parcel. (Assessor’s Parcel No,
LETTER

[APN] 344-131-0100. Phase II would consist of the construction of new structures and the parking lot on the approximately 0.8-acre adjacent vacant lot (APN 344-120-6300) and the public right-of-way. The purpose of the public right-of-way vacation is to increase the lot size and make use of unutilized land. The proposed project would have an overall building square footage of approximately 6,000 square feet. Upon completion of the new structure, Hillel will vacate the house and return it to its original use. The project has been designed to meet the standards required to obtain a Leadership in Energy and Environmental Design (LEED) Silver rating.

The project site is bounded to the north by La Jolla Village Drive, to the east by La Jolla Scenic Way, and to the south by La Jolla Scenic Drive. The project site is within a Single Family Zone of the La Jolla Shores Planned District, Coastal Height Limit Overlay Zone, Campus Parking Impact Overlay Zone, and the La Jolla Community Planning Area. Legal Description: Lot 57 of La Jolla Highlands Unit No. 3, in the City of San Diego, County of San Diego, Section 36, Pueblo Lands, in the City of San Diego, County of San Diego. The site is not included on any Government Code Listing of hazardous waste sites.

Applicant: Hillel of San Diego

Recommended Finding: Pursuant to Section 15061(d) of the CEQA Guidelines, it appears that the proposed project may result in significant environmental impacts in the following areas: Land Use, Transportation/Circulation/Parking, Biological Resources, Global Warming/Greenhouse Gases, Noise, Geology/Soils, Historical Resources, Paleontological Resources, Hydrology, Water Quality, Cumulative Effects, and Growth Inducement.

Availability in Alternative Format: To request the City’s letter to the applicant detailing the required scope of work, (IR Scoping Letter) in alternative format, call the Development Services Department at (619) 466-5460 immediately to ensure availability. This information is also available in alternative formats for persons with disabilities; to request this notice in alternative format, call (619) 466-5446 or (800) 733-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Elizabeth Shearer-Nguyen at (619) 466-5368. The Scoping Letter and supporting documents may be reviewed, or purchased for the cost of reproduction, at the Fifth Floor of the Development Services Department. For information regarding public meetings/hearings on this project, contact the Project Manager, John Fisher, at (619) 466-5231.

This notice was published in the San Diego Union Tribune and the San Diego Transcript, and placed on the City of San Diego website (http://civicdocs.sandiego.gov/Website/public_notice/publicnotice.html) and distributed on October 3, 2010.

Cecilia Gallardo, AFCP
Assistant Deputy Director
Development Services Department

DISTRIBUTION: See Attached.

ATTACHMENTS: Figure 1: Regional Vicinity Map
Figure 2: Project Location on Aerial Photograph
Figure 3: Project Site Plan
Scoping Letter

RTC-170
MEMORANDUM

DATE: December 3, 2008

TO: Honorable Mayor and City Councilmembers

FROM: Karen A. Hosmann, Assistant City Attorney

SUBJECT: December 2, 2008 Council Docket Item 343, Approval of SDSSCD Joint Petition No. 49943. An application for a Site Development Permit, Exemptions, Access, and Public Right-of-Way Vacation (portion of La Jolla Scenic Drive North between Torrey Pines Road and La Jolla Scenic Way) for a two-phased development.

INTRODUCTION:

On December 2, 2008, the City Council was scheduled to hear and consider Item 343, regarding development of the SDSSCD Joint Petition No. 49943. The item included four separate requests for action:

1. Certify the Mitigated Negative Declaration No. 49943, Adopt Mitigation Monitoring and Reporting Program
2. Approve Site Development Permit No. 32786
3. Approve Exemption Acquisition No. 32786
4. Approve Public Right-of-Way Vacation No. 32786

This memorandum addresses noticing deficiencies for the public right-of-way vacation.

After the Council item had already been declared and the docket was posted for the December 2 meeting, the City Attorney was notified of a potential procedural defect related to the posted notice of the Public Right-of-Way Vacation (No. 4 above).

After an independent review of the property posting requirements and whether those requirements had been met, this Office advised the City Council that the property posting requirement would be satisfied by issuing the public right-of-way vacation on December 5. The other sub-items could be properly continued on December 5, when all four components of the project could be heard at a special meeting of the Council. A motion for continuance was
POSTED NOTICE OF APPLICATION
DEVELOPMENT SERVICES DEPARTMENT

Please be advised that an application has been filed with the City of San Diego for a Site Development Permit, Easement Dedication, and Public Right-of-Way Vacation for a two-phased development to continue the use of an existing single-family dwelling for religious office and related purposes as a Phase I entitlement and to develop a triangular shaped parcel on the south side of La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way with a 12,100 square-foot student center with a lower level garage of 17,000 square-feet of area as a Phase II entitlement. Phase I involves the continued use of a 1,792 square-foot single-family residence and garage/structure at 8976 Chalford Avenue for religious offices and related use until such time as the proposed Phase II is developed and approved for occupancy. Phase II involves the development of a two-level student center consisting of an upper level main floor use area of 12,100 square-feet and a lower subterranean garage of 17,000 square-feet for the parking of 68 vehicles, trash enclosures and elevators. The sites are located at 8976 Chalford Avenue (Phase I, an 8,358 square-foot site) and a vacant 0.77-acre triangular site (Phase II) surrounded by La Jolla Village Drive, La Jolla Scenic Way, and La Jolla Scenic Drive North, in the Single Family (SP) Zone of La Jolla Shores Planned District within the La Jolla Community Plan, Coastal Height Limit Overlay Zone, Parking Impact Overlay Zone, and Council District 1. The project design incorporates a roof-mounted photovoltaic system consisting of solar panels and the installation of a fuel cell sufficient to generate at least 30 percent of the project’s projected energy consumption, meeting the requirements of City Council Policy 900-14.

PROJECT NUMBER: 149457
PROJECT NAME: HILLEL OF SAN DIEGO STUDENT CENTER
CONTACT NAME: ROBERT LAPIRUS
COMMUNITY PLAN AREA: LA JOLLA
CITY PROJECT MANAGER: Daniel Stricker
MANAGER PHONE NUMBER: (619) 446-5251

The decision to approve or deny this application will be made at a public hearing. This item will be discussed by the Community Planning Group for the area in which the project is located. They will make an advisory recommendation to the City of San Diego.

You may contact Joe LaCava, Chair of the La Jolla Community Planning Association at (858) 488-0160 to inquire about the community meeting dates, times, and location for community review of this project.

If you have any questions regarding this application after reviewing this information, you can call the City of San Diego Project Manager listed above.

This information will be made available in alternative formats upon request.
Job Order No. 43-8079

RTC-172
POSTED NOTICE
OF PUBLIC HEARING
PUBLIC RIGHT-OF-WAY VACATION
DEVELOPMENT SERVICES DEPARTMENT

DATE OF HEARING: October 16, 2008
TIME OF HEARING: 9:00 AM
LOCATION OF HEARING: Council Chambers, 12th Floor, City Administration Building, 202 C Street, San Diego, California

PROJECT NUMBER: 149437
PROJECT NAME: HILLEL OF SAN DIEGO STUDENT CENTER
APPLICANT: Hillel of San Diego

COMMUNITY PLAN AREA: La Jolla
COUNCIL DISTRICT: District 1
ITY PROJECT MANAGER: Daniel Stricker, Development Project Manager
PHONE NUMBER: (619) 440-5251

UNDER THE PROVISIONS OF THE PUBLIC STREETS, HIGHWAYS AND SERVICE BASEMENTS VACATION LAW AND FIXING A TIME AND PLACE FOR HEARING THEREOF.

NOTICE IS HEREBY GIVEN that the Council of the City of San Diego, California, will proceed under the provisions of the Public Streets, Highways and Service Basements Vacation Law to adopt a Resolution terminating the public right to use a certain street and/or public service easement as shown on drawing no. 00116-C, located along the north side of La Jolla Scenic Drive North, between Cliffridge Avenue and La Jolla Scenic Way to be vacated.

For more information concerning this notice, contact the City Project Manager listed above.
NOTICE OF PUBLIC HEARING
PLANNING COMMISSION RECOMMENDATION

DATE OF HEARING: October 16, 2008
TIME OF HEARING: 9:30 AM
LOCATION OF HEARING: Council Chambers, 12th Floor, City Administration Building, 202 C Street, San Diego, California

PROJECT TYPE: Site Development Permit, Easement Dedication, and Public Right of Way Vacation
PROJECT NUMBER: 140457
PROJECT NAME: HILLCREST OF SAN DIEGO STUDENT CENTER
APPLICANT: Hillcrest of San Diego

COMMITTEE PLAN AREA: La Jolla
COUNCIL DISTRICT: District 1
CITY PROJECT MANAGER: Daniel Strickler, Development Project Manager (619) 446-5251

As a property owner, tenant or person who has requested notice, you should know that the Planning Commission will hold a public hearing to recommend approval, conditional approval, or denial to the City Council of an application for a Site Development Permit, Easement Dedication, and Public Right-of-Way Vacation (portion of La Jolla Scenic Drive North between Torrey Pines Road and La Jolla Scenic Way) for a two-phased development to continue the use of an existing single-family dwelling for religious offices and related purposes as a Phase I entitlement; and to develop a triangular shaped parcel on the south side of La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way with a 12,100 square-foot religious student center with a lower level garage of 17,000 square-feet of area as a Phase II entitlement. Phase I involves the continued use of a 1,792 square-foot single-family residence and garage/storage structure for religious offices and related use until such time as the proposed Phase II is developed and approved for occupancy. Phase II involves the development of a two-level religious student center consisting of an upper level main floor use area of 12,100 square-feet and a lower subterranean garage of 17,000 square-feet for the parking of 68 vehicles, trash enclosures and elevators. The site is located at 9976 Cliffridge Avenue (Phase I, a 8,879 square-foot site) and a vacant 0.77-acre triangular site (Phase II) surrounded by La Jolla

RTC-174
LETTER

Village Drive, La Jolla Scenic Way, and La Jolla Scenic Drive North, in the Single Family (SF) Zone of La Jolla Shores Planned District within the La Jolla Community Plan, Coastal Height Limit Overlay Zone, Parking Impact Overlay Zone, and Council District 1. The project design incorporates a roof-mounted photovoltaic system consisting of solar panels and the installation of a fuel cell sufficient to generate at least 30 percent of the project’s projected energy consumption, meeting the requirements of City Council Policy 900-14.

The decisions to approve, conditionally approve, modify or deny the two-phased development will be made by the City Council at a future public hearing. You will also receive a notice of the City Council public hearing.

If you have any questions after reviewing this information, you can contact the City Project Manager listed above.

The agenda will be made available in alternative formats upon request. To request an alternative format or to request a sign language or oral interpreter for the meeting, call the Information Services Program Coordinator at (619) 236-5979 at least five working days prior to the meeting to ensure availability. Assistive Listening Devices (ALDs) are available for the meeting upon request.

Job Order No. 43-0276

RESPONSE

RTC-175
Z-8

This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.
Project Name (UCSD Edith Center for Jewish Life) and Number (2129193)

Where is exactly Site 675. Please show on accurate Map

Patricia Granger
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### LETTER

**Subject:** UCSD Hillel Center for Jewish Life, Project No. 212995

**Limiting the size and future expansion of the Hillel projects.**

Robert Lapedus said at the Traffic and Transportation meeting in 2011 said that there were often 400 students on UCSD campus attending Shabbat on Friday evenings.

In the letter to Mayor Jerry Sanders and Council president Tony Young from the Human Relations Commission, November 5, 2012. The letter quotes Michael Rabkin of the Hillel of San Diego saying,

“UCSD students, including the 2,000 Jewish students, are an integral part of the La Jolla community. These students and Hillel, which serves them, should not be treated differently than any other group that would seek to build a legitimate, permanent religious facility in the neighborhood. This indicates that Hillel may well have plans to expand the current planned facility, which doesn’t have a CPU to limit its growth. What protection can the La Jolla Highlands neighborhood expect from the City of San Diego in regarding Hillel’s future growth?

UCSD is in the University Community Plan District, where University related Student Centers and Religious organizations were planned to go.

Patricia Granger

### RESPONSE

The mechanism to enforce the level of activity and attendance numbers is through the conditions of approval of the Site Development Permit.

As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.
No trees, no gophers, no raptors, no problem.

Under biological in the section on biological impacts, plants and creatures found, there was no mention of gophers.

In the past Site 653 was gopher central, the land was covered with active gopher mounds. I went to look at the property yesterday. I found there was very little activity. It looked as if some of the soil of the gopher mounds had been pushed aside to expose the holes, and there were a lot of open holes. If the gophers had been alive the holes would have been filled in with one day. It crossed my mind that someone may have taken care of a potential problem.

I asked a friend, a biologist/anthropologist if there were any way of detecting if the holes had been poisoned or gassed some months after the event. He replied that it could be possible but very expensive. He suggested checking to see if the City had any work orders placed to clear the land.

First the City removed the trees so there would be no perching or nesting places. Were the gophers removed so there would be no prey for the raptors? In the past I have seen the following birds either perched or hovering over Site 653. Red-tailed Hawk, Cooper’s hawk, Kestrels, in the evening and into the night the Great Horned Owl was a regular visitor.

Please will you check to see if any such extermination of gophers has taken place in the past two years by any departments within the City of San Diego?

Raptor Description from Sibley

Red Tailed Hawk p 106
Common and widespread; the hawk commonly seen perched on trees, poles, or fenceposts along roads or fields. Nests in tall trees with open feeding areas nearby. Solitary. Hunts mainly from perch, choosing the same sentinel perch day after day. Feeds on small mammals.

Cooper’s Hawk: p. 100

America Kestrel p. 115
Uncommon in many open habitats from dessert grasslands to meadows to brushy fields; often seen on roadside wires or fenceposts, pouncing its tail. Nests in tree cavities
birdhouses or crevices in building. Solitary. Hunts within a small range, mainly for insects and small mammals from perch or by hovering and dropping straight down.

Great Horned Owl p. 239
Uncommon but widespread. Nocturnal; roosts during the day in trees, on sheltered cliff ledges, or in other secluded spots; at night forages in woods, fields and forest edges for medium sized mammals, such as rabbits and skunks. Usually solitary.
March 11, 2013

Ms. Elizabeth Shearer-Nguyen
Environmental Planner
City of San Diego
Development Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Comments on the Draft Environmental Impact Report for the UCSD Hillel Center for Jewish Life; Project Number 212995

Dear Ms. Shearer-Nguyen:

Thank you for the opportunity to comment on the above draft environmental impact report (DEIR). I am providing the following comments on behalf of the Taxpayers for Responsible Land Use (TRLU). Please provide me with all notices related to this project in the future.

The Public Notice of a Recirculation Draft Environmental Impact Report is Inadequate

Public review is an essential part of the CEQA process, and comments provided are an integral part of the final EIR. CEQA requires the public notice to include the address where copies of the DEIR and all documents referenced in the DEIR are available for review. The CEQA Guidelines require that the DEIR be made available in its offices and in public libraries serving the affected area. The public review period does not begin to run until the agency provides the public with complete copies of the DEIR. The public review period is 45 days for DEIRs that are submitted to the State Clearinghouse.
The City as Lead Agency followed all EIR noticing requirements under CEQA as required per the CEQA Guidelines. The Notice of Availability of the Draft EIR was distributed to agencies, organizations, and individuals who were known to have an interest in the project. In addition, the notice was published in the San Diego Daily Transcript. The notice included a website indicating where the Draft EIR could be found.

The EIR, Section 1.3.1.1 stated the following:

The Draft EIR and all related technical studies are available for review during the public review period at the offices of the City of San Diego Development Services Department located on 1222 First Avenue, Fifth Floor, San Diego, California 92101. Copies of the Draft EIR are also available at the following public libraries:

- San Diego Public Library, Central Library, 820 E Street, San Diego, California 92101
- La Jolla Branch Library, 7555 Draper Avenue, San Diego, California 92037

This EIR is also available for review online at: http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html.

The City provided adequate notice of the EIR under CEQA.

Pursuant to CEQA Guidelines Section 15123, an EIR is required to contain a summary of the proposed actions and its consequences. The summary is required to include the following: (a) identification of significant effects with proposed mitigation measures and alternatives that would reduce or avoid each effect; (b) areas of controversy; and (c) issues to be resolved. (see CEQA Guidelines Section 15123 (b)). The EIR provides an adequate Executive Summary addressing all required information as required pursuant to CEQA.

With respect to the size of the project site in relationship to the ROW, the EIR provides an accurate project description (see Chapter 3) in accordance with the requirements of Section 15124 of the CEQA Guidelines. Specifically, the existing vacant lot upon which the
### LETTER

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character (Section 4.12), for the reasons detailed within each section, respectively. The EIR did conclude that there would be significant impacts associated with biological resources, noise, and paleontological resources. Therefore, the focus of the alternative selection was to provide feasible alternatives which could potentially reduce those impacts. To that end, the EIR evaluated four alternatives (Existing with Improvements Alternative, No Project Alternative, Reduced Project Footprint on Vacant Parcel Alternative, and the Alternate location known as the Site 675 Alternative). Each major issue area included in the impact analysis of this EIR has been given consideration in the alternatives analyses. A comparison of impacts associated with each alternative is shown in EIR Table 9-1. As further discussed throughout Chapter 9, while some impacts associated with the alternatives may be less than the project, no alternative would meet the project objectives.

With respect to the adequacy of the Executive Summary, see response to comment AA-2.

As required under CEQA Guidelines Section 15125(a):

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published.

The NOP was published on October 8, 2010. Therefore, the baseline conditions are adequately described, and conditions prior to that date (i.e., in the year 2000) are not applicable according to CEQA. The history of the project is summarized in Section 3.6 of the EIR.

Although Cooper’s hawk was not observed during biological surveys, the EIR discloses that eucalyptus trees on-site have the potential to support this species and that removal of the trees could result in a significant impact. Mitigation measures associated with this potentially significant impact is detailed in EIR Section 4.3.3.3.

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Environmental Setting

The City of San Diego committed to a definite course of action to allow the construction of a student center when it awarded Hillel the exclusive negotiating rights for the purchase of the property in 2000. At that time the project site was designated Open Space in the Community Plan, there were several eucalyptus trees on and adjacent to the project site providing raptor habitat and the Cliffridge Property was being used as a single-family residence. The City should not rely on its failure to require a DEIR once it committed to the project to set a baseline that does not reflect existing conditions at the time of that commitment. The baseline should be set at the time when the environmental analysis should have commenced. The environmental setting must include sufficient detail to apprise the readers of the DEIR of the nature of the environmental resources affected by the project.

The environmental setting misleads the reader about existing land cover by stating raptor species, such as the Cooper’s hawk, have the potential to nest and forage. At a minimum, Cooper’s hawks are known to forage on the project site and are frequently observed foraging on the project site. Several eucalyptus trees were removed while this project was being processed by the City. Those trees provided nesting and foraging for raptors; the baseline should include the eucalyptus trees that were removed during the processing of the project.

The project site rises above La Jolla Village Drive, providing the dominant landform upon entering the La Jolla Highlands gateway into La Jolla Shores. The Environmental Setting inaccurately describes the topography of the project site as having no dominant or unique landforms on the project site.

The environmental setting should go beyond the boundaries of the project site to include environmental resources that are rare or unique to the region and may be affected by the project. The environmental setting fails to adequately describe the unique cultural resources found in La Jolla, in particular in the vicinity of the project site. Several significant archaeological sites are located in the immediate vicinity of the project site and must be described in the environmental setting to provide a proper baseline against which to compare the project. The project will be required to relocate existing utilities; the area disturbed by this work should also be included in the baseline.

On-street parking is also provided on La Jolla Scenic Way – the environmental setting fails to describe on street parking on La Jolla Scenic Way. This is particularly egregious given the project plans to remove this parking.

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<td>AA-6</td>
<td>With respect to CEQA, a dominant or unique landform is usually defined as a specific on-site large-scale feature such as mesas or rock outcroppings that represent a specific geological resource, impacts to which could be considered significant. EIR Chapter 2, Environmental Setting, provides an overview of the topography of the project site. Specifically, Section 2.3.2 accurately identifies the steep cut slopes on the north and eastern edges of the site. The existing conditions of the project site do not represent dominant or unique landform characteristics as contemplated by CEQA.</td>
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<td>AA-7</td>
<td>An EIR must address rare or unique resources in the context of its determination of significance. With respect to the rich history of cultural resources within the San Diego region, the EIR contains a detailed analysis of potential impacts to such resources which could occur as a result of the project. Potential impacts to archaeological resources are discussed in Section 4.7. As detailed therein, no previously recorded cultural resource sites are located within the project boundary; however, 16 sites have been recorded within one mile of the site. As detailed in Section 4.7.4.1 of the EIR, a subsurface cultural resources assessment was performed of the project site which entailed the excavation of 20 shovel pits. The survey and testing did not result in the discovery of any archeological sites or features. Impacts were determined to be less than significant.</td>
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<td>AA-8</td>
<td>Information regarding on-street parking was added to the recirculated EIR (December 2013). As detailed in EIR Section 2.3.7, “On-street parking is available on La Jolla Scenic Drive North, La Jolla Scenic Way, and Cliffridge Avenue.”</td>
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</table>
AA-9a See response to comment AA-5.

AA-9b As summarized in the Environmental Setting, Section 2.5, and detailed in Section 4.1, the project is consistent with all relevant plans, programs, policies and ordinances.

AA-9c The project is an allowable use in its proposed location.

Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “...is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

AA-9d The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the
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<td>AA-9d (cont.)</td>
<td>EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.</td>
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<td>AA-10</td>
<td>See responses to comments AA-5 and AA-9c.</td>
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| AA-11 | The language was revised within the recirculated EIR (December 2013). EIR Section 2.5.4.1 now states:  
According to the LJSPD Ordinance, “churches, temples, or buildings of a permanent nature, used primarily for religious purposes” are permitted uses within residential zones (Municipal Code Section 1510.0303(e) [Single-Family Zone – Permitted Uses]).  
With respect to the use allowed in this location, see response to comment AA-9c. |
| AA-12 | The Environmental Setting chapter of the EIR is adequate and prepared pursuant to and contains all requirements of the CEQA Guidelines (see CEQA Guidelines Section 15125). See response to comments AA-5 through AA-11 relating to the adequacy of the Environmental Setting.  
With respect to the adequacy of the Project Description, see AA-3.  
With respect to the project as an allowable use in this location, see response to comment AA-9c. |
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determine the project is a student center for Hillel. It is not until the project objectives the reader is told the purpose of the project is to provide a permanent religious learning and gathering space for students. Whereas the project was previously called the Hillel Student Center, the name has been changed to the UCSD Hillel Center for Jewish Life, never leading the reader to understand this is a student center in a single family residential zone.

The public notice, introductory pages, executive summary (short summary), and executive summary (in body of DEIR) all fail to describe the use as a student center. Rather, the project description in each of these sections focuses on the physical development of the property and fails to provide any information on the use of the project as a student center.

The project description in each of the sections is confusing and difficult to understand. The size of the project site is described as 2 acres for the Cliffridge property and .8 acres for Site 653, does this average include the land gained from the right-of-way vacation? Since the right-of-way vacation has been set aside by the Court, the project site should be properly described and the project description should clearly state the amount of land to be gained from the right-of-way vacation. This discrepancy occurs throughout the document.

The project objectives are internally inconsistent and cleverly designed to artificially limit the consideration of project alternatives. The second objective is:

- Provide a permanent religious space in a centralized location for Jewish Students at UCSD which, because of separation of church and state issues, cannot be built on the UCSD campus but is located close enough to UCSD to serve students where they live and attend classes.

The fourth objective conflicts with the above objective in that it limits the location of the student center to within ¼ mile of the southern portion of the UCSD Campus. The southern portion of the UCSD campus is not a centralized location. In addition, UCSD is organized by colleges that provide classes and housing in all areas of the 2,141 acre campus. It is clear the project objectives were designed to limit the consideration of alternative sites by stating an objective to locate the student center to within ¼ mile of the southern portion of the campus. There is no other explanation as to why the southern portion of the campus is located closer to where students live and attend classes than any other portion of the campus. These project objectives are indicative of the predetermined outcome of an EIR that is prepared too late in the process. Failure to prepare an EIR as early as feasible in the planning process forecloses the opportunity for environmental considerations to influence the project program and design. The consideration of alternatives would be significantly more meaningful if the City performed the requisite analysis prior to entering into exclusive negotiations for the purchase of Site 653 by Hillel. The elements of the project description required by CEQA must be precise and

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<td>AA-13     See response to comment AA-2.</td>
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<td>AA-14a    The project objectives identified within the EIR include the underlying purpose of the project and are written in order to help the lead agency develop a reasonable range of alternatives to evaluate, as required within Section 15124(b) of the CEQA Guidelines. The two objectives referenced by the commenter do not conflict with each other. The eight project objectives, taken together, support the approval of the project as both serving the mission of the Hillel organization while also creating a sustainable development in accordance with local and regional goals. With specific reference to the objective of locating the facility to promote walkability, the project site is located at the closest feasible location to the UCSD campus and transit connections. Alternatives locations were examined. CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:</td>
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<td>AA-14b    The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.</td>
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A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.

See response to comment AA-15a.

Pursuant to CEQA Guidelines Section 15378, a project requiring CEQA review includes an action which has the potential for resulting in reasonably foreseeable physical changes to the environment. The initial sale of the property to the Hillel organization is not a project under CEQA. The environmental process began when Hillel first submitted project plans and applied for discretionary permits. Over the last 13 years, the project has evolved and the CEQA process has been implemented culminating in the filing of an NOP for the preparation of an EIR. As required under CEQA Guidelines Section 15125(a), an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the NOP is published. The NOP was published on October 8, 2010. Therefore, the baseline conditions are adequately described, and conditions prior to that date are not applicable according to CEQA.

The EIR contains all required analysis pursuant to CEQA including an accurate project description, reasonable range of alternatives, and detailed evaluation of potentially significant effects.
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accurate to overcome the prejudice of preparing the EIR 13 years after the City committed to a definite course of action to allow the construction of a student center on the project site.

AA-15

The project description fails to list all necessary discretionary actions. Figure 3-1 includes a note that a lot consolidation parcel map is required; this is a separate discretionary action requiring compliance with the Subdivision Map Act in addition to the municipal code. This discretionary action must be clearly listed in the project description. The area of the cul-de-sac is currently designated as Roads/Freeways/Transportation. Hillel is proposing to convert the area of the cul-de-sac for private use, with a portion being incorporated into the residential property of 8976 Clifford Avenue, and the remainder being incorporated into the Hillel project site under the single family residential zone. This vacation of the cul-de-sac requires an amendment to the Land Use Element of the General Plan.

AA-16

The figures in the DEIR are too small to read, when enlarged the resolution is so poor it is still difficult to read the figures. This results in a distorted project description that distorts the objectives of the preparation of an EIR. The project description fails to note the current use of the Clifford property is a code violation for which the Neighborhood Code Compliance Division maintains an open case.

AA-17

The project description is not consistent in that the Executive Summary describes the Existing with Improvements Option as using the existing residence to provide for religious programs on a permanent basis. The project description in the body of the DEIR describes the Existing with Improvements Option as converting the Clifford property to permanent office and administrative uses for Hillel. Office and administrative uses are not permitted in the single family zone of the La Jolla Shores Planned District. Continued use of the Clifford property will require an amendment to the LJSPD. The project description fails to include an amendment in the list of discretionary approvals.

AA-18

The description of Hillel’s historic programming is not consistent with Appendix D of the Traffic Impact Analysis dated June 3, 2010. The traffic study made available online did not include the Appendices with the raw data upon which the traffic conclusions were based. The DEIR relies on existing operations taking place in a variety of locations to describe the operations that can be expected at the new facility. CEQA

AA-19

6 County of Iowa, supra, 71 Cal.App.3d at pp. 192-193.

RESPONSE

AA-15 All of the required discretionary approvals are listed within Section 3.3 of the EIR. A lot consolidation parcel map is not a discretionary approval.

The ROW vacation does not require an amendment to the Land Use Element of the General Plan because it is not a Circulation Element road.

AA-16 Section 3.4.2.1(j) was revised in the recirculated EIR (December 2013) as follows:

The existing Phase 2 site area, without the proposed ROW vacation and dedication, is 15,350 square feet. The proposed Phase 2 site area, with the proposed ROW vacation and dedication, would total 33,541 square feet. After the subtraction of the 10,000 square-foot landscaped area, the Phase 2 site would total 23,541 square feet.

As discussed further in Section 4.1, Land Use, the maximum allowable lot coverage in the LJSPD is 60 percent. The proposed lot coverage for Phase 2, with the landscaped area, would be 15.8 percent (5,291 square feet divided by 33,541 square feet). The lot coverage without the landscaping would be 22.5 percent. The proposed floor area ratio (FAR), including the phantom floor of the HCJL, would total 0.21 FAR (7,084 square feet divided by 33,541 square feet).

Section 3.4.2.1(i) was also revised in the recirculated EIR to provide additional information on La Jolla Scenic Drive North:

Phase 1/Phase 2 proposes to narrow La Jolla Scenic Drive North by 2 feet to provide for a 12-foot corridor on the north side of the roadway with increased landscaping. La Jolla Scenic Drive North currently measures 36 feet wide from curb to curb. As detailed in Section 4.2.5.1, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards.
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<td>AA-17</td>
<td>The figures were developed to be as clear as possible. An electronic PDF version of the EIR was made available on the City's website along with CD copies available to the public, which would allow readers to zoom in as much as needed.</td>
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<tr>
<td>AA-18</td>
<td>The pending code violation is not a CEQA issue and relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support the current use. The issue is intended to be resolved in connection with approval of the proposed project. The description of the Existing with Improvements Alternative is contained in Section 9.2.1 of the FEIR. See response to comment AA-3.</td>
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<td>AA-19</td>
<td>The Traffic Impact Analysis was updated in 2013 and the analysis was revised in the recirculated EIR (December 2013). As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site. The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.</td>
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The recirculated EIR (December 2013) was revised to clarify the gross floor area and net square footage of each building. EIR Tables S-1 and 3-1 have the same square footage for each building in the recirculated EIR. Furthermore, EIR Section 3.4.2.1 adequately describes the anticipated uses of all three buildings that comprise the Phase 1/Phase 2 project.

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel
facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

The recirculated EIR (December 2013) was revised to clarify the walls needed for screening. As detailed in EIR Section 3.4.2.1(j):

- Retaining / screening walls and planting would be required and are shown in Figure 3-4. These would be located primarily along La Jolla Scenic Way (eastern portion of the property to screen the parking area) and La Jolla Village Drive (northern portion of property as berm and screening walls). The walls would be at least four feet in order to screen parking areas, but would not exceed a height of six feet. The total length of screening walls is 267 feet.
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<td>AA-24a</td>
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<td>AA-24b</td>
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AA-25 Section 4.1.1.1 has been revised in the recirculated EIR (December 2013) as follows:

The Planning Context of the Environmental Setting, Section 2.5 of this EIR, describes the land use plans and development regulations that apply to development of the project.

AA-26a A request for a Deviation from Parking Regulations has been added to the list of discretionary actions under the Existing with Improvements Alternative. See FEIR Section 9.2.1.

AA-26b Upon occupation of the new facilities under the Phase 1/Phase 2 project, the temporary use of the Cliffridge property would expire and revert back to single dwelling unit use. To identify subsequent ownership or residents of the Cliffridge property would be speculative and beyond the scope of the requirements of CEQA; however, there is no plan for the Cliffridge property to be used as an extension of the project.

With regards to the cul-de-sac, the ROW vacation would be abandoned to provide landscaping, a pedestrian/cyclist parkway, and park-like amenities, and would not be utilized for parking as detailed in EIR Section 3.4.2.1(f).

AA-26c See response to comment AA-26b.

AA-26d See response to comment AA-26a.

AA-27 With respect to the proposed use, see response to comment AA-9c. See also response to comment AA-21.

AA-28a See response to comment AA-9c.

AA-28b Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1),
it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

With respect to the project’s noise compatibility, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m. and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR
The Existing with Improvements Option is not an allowed use in the single family zone of the LISPDO. Although structures of a permanent nature used primarily for religious purposes may be allowed, Hilbel is proposing to use the residence for administrative offices. The Existing with Improvements Option will cause significant land use impacts because it is not an allowed use in the zone.

The proposed project is not consistent with the La Jolla Shores Design Manual which is an integral part of the LISPDO. Per the City’s thresholds of significance, this inconsistency with the La Jolla Shores Design Manual and LISPDO is a significant land use impact.

The DEIR appears to rely on consistency with some of the goals, policies and objectives of the applicable land use documents to justify ignoring or failing to comply with all of the land use goals, policies and objectives. Although some aspects of the student center may be laudable, this does not forgive or nullify the significant impacts caused by development of the student center. Inconsistency with these goals, policies and objectives should be the crux of the land use analysis in the DEIR.

The Phase 1/Phase 2 project proposes to use the area of the cul-de-sac currently designated as Roads/Freeways/Transportation for a student center project. This use of the road for a student center is a conflict with the land use policies of the General Plan and is a significant land use impact.

The DEIR appears to rely on the history of the project site showing that there is an access restriction to the site that restricts access along La Jolla Scenic Way where the proposed driveway is to be located. (See Attachment A). The study area fails to encompass all affected streets – the analysis should also include impacts to Glenbrook Way as this road will likely be used as a by-pass due to the construction of the Venter Institute and the right-turn only limitation out of the student center parking lot. The study fails to provide traffic volumes for existing conditions on Cliffridge Avenue and Glenbrook Way that are necessary to set a baseline against which to compare the effects of the student center.

The traffic impact analysis does not comply with the standards identified in the City’s Traffic Impact Study Manual and relies on a flawed methodology for determining trip generation rates. Some of the assumptions in the HCM (Highway Capacity Manual) analysis are not consistent with the requirements of the traffic study manual assumptions. For example, the traffic analysis assumed a peak hour factor of 0.92 for all intersection analysis for all time frames. While this is in the range of peak hour factors identified on Page 19 in Table 6 of the City’s Traffic Impact Study Manual, the actual peak hours from the traffic counts should be utilized. The results of changing the assumptions would have an impact on the conclusions drawn from the level of service

AA-29 (cont.) concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.

See the response to comment AA-3.

The project is analyzed in relation to applicable LJSPD ordinance design regulations, including the La Jolla Shores Design Manual, within Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character).

Impacts to land use are evaluated consistent with the City’s 2011 Significance Thresholds. As stated in EIR Section 4.1.2 impacts to land use would be significant if a project conflicted with the environmental goals of a community plan. Land use compatibility is specifically addressed in EIR Section 4.1.4. As determined therein, the project would comply with the City’s General Plan, La Jolla Community Plan, La Jolla Shores Planned District Ordinance, and La Jolla Shores Design Manual. Overall, the project is found to be compatible with all relevant plans and no secondary environmental effects would occur.

EIR Section 4.1 adequately analyzes the project in relation to relevant goals, policies, and objectives of the applicable land use documents. See response to comment AA-31.

With respect to the project’s proposed use at this location, see response to comment AA-9c.

With respect to the use of the road for this purpose, as detailed in DEIR Section 4.2.5.1(a), vehicles may currently use the La Jolla Scenic Drive North cul-de-sac as a turnaround area. As shown in Figure 4.2-2 during the AM peak hour (highest hour between 7-9 a.m.), no vehicles turned into the cul-de-sac from La Jolla Scenic Drive North, and only two vehicles turned into the cul-de-sac from Cliffridge Avenue. Only seven vehicles turned into the cul-de-sac during the PM peak hour (highest hour between 4-6 p.m.). Phase 1/Phase 2 would vacate the westerly cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. The vacation of the street right-of-way and street reconfiguration will provide pedestrian improvements at this location.
There is not a restriction on access to La Jolla Scenic Way. With respect to the safety of the driveway access, a project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

The Phase 1/Phase 2 project would generate a total of 8 peak hour trips. The City does not require an analysis of roadways to which a project is forecasted to add less than 50 peak hour trips because the small number of trips would not contribute to significant traffic impacts. Since the project will add much less than this amount to Glenbrook Way and Cliffridge Avenue, an analysis of these roadways is not warranted.

City standards allow the use of a 0.92 peak hour factor. However, in order to fully address the comment, the counted peak-hour factors were utilized in the signalized intersection analysis. The resulting Year 2030 with project intersections details/LOS are shown below. Since LOS D or better operations are calculated, no significant impacts are calculated.

<table>
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<tr>
<th>Intersection</th>
<th>AM Peak</th>
<th>PM Peak</th>
<th>LOS</th>
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<tr>
<td>La Jolla Village Drive/Torrey Pines Road</td>
<td>52.8 sec (delay)</td>
<td>37.3 sec</td>
<td>D</td>
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<tr>
<td>La Jolla Village Drive/La Jolla Scenic Way</td>
<td>16.7 sec</td>
<td>26.3 sec</td>
<td>C</td>
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</table>
With respect to project trip generation, as detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.
See the response to comment AA-19.

The EIR adequately disclosed the potential use of the Phase 1/Phase 2 project and in turn adequately analyzed potential traffic impacts, which were determined to be less than significant as detailed in EIR Section 4.2.

See response to comment AA-36.

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2(a), specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

The traffic study used the actual number of counted pedestrians in the analysis. For instance, 93 pedestrians per hour was utilized at the La Jolla Village Drive/Torrey Pines Road intersection analysis for the crossing of La Jolla Village Drive in the AM peak hour and 129 pedestrians per hour in the PM peak hour, much greater amounts than indicated in City guidelines. It is not clear as to where the commenter noted three pedestrian calls per hour.

The recirculated EIR (December 2013) included this information. Please refer to EIR Section 4.2.1.2(b). As stated therein:
<table>
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<td><strong>AA-42</strong> The project's location in the Parking Impact Overlay Zone is detailed in EIR Section 2.5.4.4:</td>
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The project site is within one of several areas citywide that are subject to the regulations of the Parking Impact Overlay Zone (Municipal Code Section 132.0801 et. seq.). The off-street parking regulations are increased in designated areas of the City, including campus areas, due to the high parking demand.

The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project's contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

The project would provide sufficient parking, as detailed in Section 4.2.4. See response to comment AA-21 as to how the parking methodology was developed.
Ms. Elizabeth Shearer-Nguyen  
March 11, 2013  
Page 11

27 parking spaces for a 6,500 square foot student center. The figures in the DEIR show 120 seats requiring a minimum of 40 parking spaces. In the alternative, the project description anticipates events drawing 100 people, indicating some assembly area within the student center. There are at least four potential assembly areas within the project requiring at least 30 parking spaces per every 1,000 square feet. Assuming less than ¼ of each building will be used for assembly area during significant events, the project provides at least 1,600 square feet of assembly area requiring 48 parking spaces (not including any outside assembly area). The proposed project does not meet either standard and includes only 27 parking spaces. The project also requires the removal of 8 on-street parking spaces. Therefore, the proposed project will result in a significant impact on parking.

The project description fails to accurately describe the proposed right-of-way vacation and to acknowledge the vacation would reduce the existing street width by two feet measured curb to curb. The traffic hazards section failed to analyze the impact of a narrower street on traffic safety given the irregular curve radius at the intersections of La Jolla Scenic Way and La Jolla Scenic Drive North; and La Jolla Scenic Drive North and Glenbridge Avenue. Local residents have provided substantial evidence of the hazard of narrower streets in this congested area.

In addition, the DEIR has failed to consider the hazard created by placing the project driveway within 150 feet of La Jolla Village Drive. Currently, a double left-turn lane from La Jolla Village Drive onto southbound La Jolla Scenic Way and vehicles in the number one left-turn lane would have to weave over quickly to access the proposed driveway. This would create weaving conflicts in this area and is the reason for historical documentation showing no access would be allowed in this area. This creates a significant traffic conflict at the project driveway and will have a significant impact on transportation/circulation/parking.

The DEIR biology report states “no active nests of any kind were detected during the survey.” However, a 2007 National Park Service report giving guidelines for adequate surveys in raptor nesting areas in central California specifies that “for a survey visit to be classified as ‘no birds’ a minimum watch time of 4 hours per day of survey” is required, over multiple days. This is because raptors often fly far from their nesting areas and may not be visible there for long periods as they forage for food. Breeding and nesting periods in California include March and April, but the DEIR chart shows observations in December, February, and July, lasting less than one hour in duration on each of these days. Not enough time was given per day and over a sufficient period for the DEIR to properly claim that an assessment of “no significant” activity was a proper one.

No hazard would be created by the placement of the driveway. The driveway would be limited to right turns only so there will be no left turn conflicts. In addition, City sight distance standards are met and the project only generates seven AM peak-hour trips and eight PM peak-hour trips. The peak hour trips are less than 1 every 6 minutes. See response to comment AA-34.

A Biological Technical Report was prepared in accordance with the City’s Biological Guidelines. There is no requirement under the City’s Biological Guidelines to observe the project site for four hours over multiple days. However, according to the Biology Guidelines...
LETTER

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Page 12

AA-46
The section on biological impacts in the Executive Summary of the DEIR states: “Cooper’s hawk is a CDFG species of special concern that could potentially occur on or adjacent to the project site. Because clearing and construction activities associated with Phase 1/Phase 2 could be disruptive to raptors including Cooper’s hawk and breeding or nesting birds, direct and indirect construction project impacts would be significant...” It then says “Direct loss of a single ornamental tree in order to construct the new parking lot and short-term activity for construction of the parking lot and interior renovation of the existing on-site structure would not require substantial clearing or grading or result in excessive construction noise affecting off-site resources. Direct and indirect impacts to raptors and breeding or nesting birds would be less than significant.” The DEIR does not make clear how long a period it will take to complete “grading and interior renovation of the house at 8976 Cliffridge.” In addition, construction of the three structures and outdoor patio planned for Phase 2, with the attendant commotion and noise disruption, will continue after grading is complete. Therefore, the DEIR assessment of impacts to raptors is misleading and possibly in error.

AA-47
The Biological Resources analysis states: “If project grading is proposed during the raptor breeding season (February 1–September 15), the project biologist shall conduct a pre-grading survey for active raptor nests within 300 feet of the development area and submit a letter report to MMC prior to the preconstruction meeting. If no nesting raptors are detected during the pre-grading survey, no mitigation is required.” The DEIR does not specify the length of time over which such a survey will be conducted, nor does it specify the date(s) during which it would be conducted, and how that might relate to the raptor nesting period. Insufficient or inaccurate prediction of disturbance to raptor breeding, nesting and/or fledging of raptors on or within 300 feet of the development is therefore likely.

AA-48
The biological mitigation measures are inadequate and will not avoid or reduce impacts on raptors. Nesting surveys should be performed immediately prior to construction, and then on a regular basis throughout the breeding season, as long as construction is taking place. If raptors begin nesting, then all construction must stop pending noise attenuation studies and either distance buffers, noise barriers, or both need to be set up in order for any work to continue. If none of these proves sufficient, then work must discontinue until the young fledglings and birds move on.

AA-49
NOISE

The DEIR fails to consider the difference in ambient noise levels created by the adjacent roadways as compared to on site generated noise from outdoor activities. The project is proposing no limitation on amplified sound or outdoor assemblies. The Noise Study provided no basis for this conclusion other than a statement that on-site generated noise was not anticipated to exceed the applicable noise ordinance standards. There is no logical basis to find the proposed student center would not cause significant noise impacts on the single family residential neighborhood located adjacent to the project site.

RESPONSE

AA-45 (cont.)
(amended 2012), surveys, for state or federally listed sensitive or MSCP-covered species older than 24 months must be updated, as appropriate, to accurately reflect resources on site.

Final EIR Section 4.3.1 has been revised to reflect that a site visit occurred on June 23, 2016 and verified that land cover types, disturbed and developed, on-site had not changed since the 2013 survey.

AA-46
The recirculated EIR (December 2013) was revised to include information regarding the construction schedule. As stated in EIR Section 3.4.2.2(b):

Construction includes demolition of the existing patio and garage, laying a new parking lot, and enhancing the landscaping, and would last approximately three to six months total, and would require no more than five workers per day.

There are no trees with the potential to support nesting raptors on the Cliffridge property. The EIR adequately concludes that the Existing with Improvements Alternative would not result in significant impacts to nesting raptors.

The Phase 1/Phase 2 would not result in indirect noise impacts to sensitive wildlife species after construction is completed. The eucalyptus trees would be removed, and extensive landscaping would be implemented, as detailed in EIR Section 3.4.2.1(f). Potential noise impacts are adequately disclosed in EIR Section 4.8.

AA-47
Mitigation measure BIO-1 was updated within the recirculated EIR (December 2013) to reflect the City’s most current mitigation requirements. The mitigation reads as follows:

To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a
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<td>AA-47 (cont.)</td>
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<td>pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to the City’s Development Services Department (DSD) for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City’s Biology Guidelines and applicable state and federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City’s Mitigation Monitoring Coordination (MMC) Section or Resident Engineer (RE), and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the precon survey, no further mitigation is required.</td>
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<td>Adherence to this mitigation measure would ensure that impacts to nesting raptors would be less than significant.</td>
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<td></td>
<td>AA-48 See response to comment AA-47.</td>
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<td>AA-49 On-site generated noise in relation to the Phase 1/Phase 2 project is analyzed in EIR Section 4.8.3.1(a). On-site noise sources analyzed in this section included activities at the courtyard and patios, which typically consist of conversations, meetings, and general social gatherings.</td>
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With respect to noise, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m., and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. While additional visitors could be located within structures, the on-site noise sources anticipated from the project site would include activities at the courtyard and patios. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices within these exterior areas, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.

With respect to the Existing with Improvements Alternative, Hillel would permanently use the existing Cliffridge. The Noise Report prepared for the project (EIR Appendix G) based the evaluation of this alternative on a maximum of 50 speaking voices. EIR Section 9.2.1 concludes that noise related to on-site uses for the Existing with Improvements Alternative would be consistent with existing measured noise levels, and therefore would not be significant when compared to existing and future traffic noise levels.

Sections 4.8.3.1 and 4.8.3.2 have been revised to include a brief discussion of potential noise impacts associated with anticipated special events at the Hillel facility that could attract more than the general daily average amount of visitors. It was determined that impacts would be less than significant.
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<td>AA-50</td>
<td>Section 4.12 of the EIR (Visual Effects and Neighborhood Character) describes the existing conditions of areas surrounding the project site. This section was revised as part of the recirculated EIR (December 2013). The environmental setting of the project is adequately described.</td>
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</table>
| AA-51  | Applicable policies from the La Jolla Community Plan were adequately analyzed in Section 4.1 (Land Use), of the EIR. Additionally, applicable design regulations from the LJSPD Ordinance and the La Jolla Shores Design Manual are also analyzed within this section.  
With respect to visual impacts of the retaining walls, see response to comment AA-29.  
Potential visual impacts under the Phase 1/Phase 2 project are adequately analyzed in Section 4.12 of the EIR (Visual Effects and Neighborhood Character). The elevations of each building associated with the Phase 1/Phase 2 project are shown in Figures 3-12a and 3-12b. Phase 2 building heights would range from 18 to 28 feet, and would be consistent with the LDC, Coastal Height Overlay Zone, and the Design Manual by not exceeding 30 feet. With respect to the project’s consistency with the community character of the neighborhood including bulk and scale, see response to comment AA-9d.  
With respect to setback consistency, the project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet. |
| AA-52  | Section 4.12 of the EIR adequately concludes that the project would not have a significant impact related to Visual Quality. See response to comment AA-51. |

RTC-206
Ms. Elizabeth Shearer-Nguyen  
March 11, 2013  
Page 14

**Significant Unavoidable Environmental Effects/Reversible Changes**

The DEIR fails to recognize and acknowledge significant impacts on Land Use, Transportation/Circulation/Parking and Visual Effects and Neighborhood Character.

**Growth Inducement**

The proposed project is a student center with a religious affiliation attempting to be categorized as a building of a permanent nature, used primarily for religious purposes. In addition, if the Phase 1/Phase 2 project is not approved, the DEIR characterizes the administrative offices of this student organization as a building of a permanent nature, used primarily for religious purposes. If this interpretation of the La Jolla Shores Planned District Ordinance is allowed, it will set precedent for allowing any student organization with a religious affiliation to follow suit. There are more than 50 similar organizations at UCSD, all of which could propose a similar project in this neighborhood. Therefore, the proposed project will have a significant growth inducing impact because it allows a use not previously allowed in this zone.

There is no evidence to support the DEIR's conclusion that development of the project would not encourage or facilitate other activities that could significantly affect the environment; either individually or cumulatively. Although the neighborhood is primarily developed, there is little to prevent a similar student organization from redeveloping a developed property or joined properties with a student center.

**Cumulative Impacts**

The cumulative impact analysis must consider the impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant project impacts. The DEIR fails to consider the Venter Institute located directly across Torrey Pines Road from the project site. Therefore, the cumulative impacts analysis is incomplete. In fact, the DEIR describes the Venter property as vacant despite the ongoing construction of a 45,000 square foot institute. The J. Craig Venter Institute is the first of four proposed buildings to be constructed directly across Torrey Pines Road from the project site. The cumulative impacts analysis is not adequate and the conclusions cannot be supported without full consideration of the impacts of the projects proposed on the Venter site.

**Project Alternatives**

CEQA requires that the DEIR evaluate a reasonable range of alternatives to the project or to the project location that would feasibly attain the project objectives but

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AA-53 See response to comment AA-28b.

AA-54 See response to comment AA-39.

AA-55 See response to comments AA-14a and AA-14c.
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| Ms. Elizabeth Shearer-Nguyen  
March 11, 2013 |
Page 15 |

would avoid or substantially lessen the significant effects of the project. The stated project objective of locating the project along the southern portion of UCSD artificially limits the consideration of alternative sites. There is no justification for this limitation, as it does nothing to promote the objective of serving students where they live and attend classes. There is no evidence the Hillel students only live and attend classes in the southern portion of UCSD. In fact, housing is available in several areas on and adjacent to the campus and is not limited to the southern portion of the campus.

The DEIR fails to provide a reasonable range of alternatives and fails to provide a viable alternative site. The alternative site discussed is a red herring in that it is essentially a steep hillside between La Jolla Village Drive and the theater district at UCSD. The alternatives analysis fails to provide the information necessary for the public to adequately consider the site as there is no figure showing the location of the alternative site.

The reduced project alternative does not result in a reduced project in that the combination of the reduced project and the Cliffside Property results in a larger project than the proposed project. The DEIR provides only three alternatives, the Phase 1/Phase 2 Project, the Existing with Improvements Project, and the No Project Alternative. The DEIR fails to provide a reasonable range of alternatives that would eliminate or substantially reduce impacts on land use, transportation/circulation/parking, and visual effects and community character. The DEIR failed to adequately analyze the impacts of all considered alternatives. Therefore the Alternatives Analysis is fatally flawed and does not meet the requirements of CEQA.

Mitigation Monitoring and Reporting Program

CEQA requires the City to adopt feasible mitigation measures in order to substantially lessen or avoid significant adverse environmental impacts of proposed projects. The mitigation measures must be capable of avoiding, minimizing, rectifying, reducing, or eliminating significant environmental effects.

The DEIR fails to provide mitigation measures that would eliminate or substantially reduce significant impacts to land use, transportation/circulation/parking and visual effects and neighborhood character.

The mitigation measures for biological resources are inadequate and will not adequately mitigate significant impacts on raptors. The project proponent is required to not directly or indirectly impact nesting raptors during the breeding season (Feb 1 - Sept 15). Nesting surveys should be performed immediately prior to construction, and then on a regular basis throughout the breeding season, as long as construction is taking place. There are not a set number of days per week that a biologist has to come on-site and

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AA-56b The alternative was updated in the recirculated EIR (December 2013) to be titled “Reduced Project Footprint on Vacant Parcel Alternative” in order to reflect that the intention of the alternative was to reduce potential impacts associated with the Phase 1/Phase 2 project. This alternative reduced the development footprint by removing one building, and reducing another to be one story instead of two, thereby reducing grading. The EIR determined that impacts associated with this alternative would be reduced with regards to visual impacts, and that biological and paleontological impacts would be similar to the proposed project.

AA-56c The EIR did not identify any significant impacts with regards to Land Use (Section 4.1), Transportation/Circulation/Parking (Section 4.2), or Visual Effects and Neighborhood Character (Section 4.12), for the reasons detailed within each section, respectively. The EIR did conclude that there would be significant impacts associated with biological resources, noise, and paleontological resources. Therefore, the focus of the alternative selection was to reduce those impacts. The EIR does address the effects of each of the considered alternatives for all topics, including land use, traffic and visual/neighborhood character.

AA-56d The EIR discloses the alternatives to the Phase 1/Phase 2 project in compliance with CEQA, including the Existing with Improvements Alternative. Chapter 9.0 of the EIR, Alternatives, describes a reasonable range of alternatives including an alternate project site in compliance with Section 15126.6(a) of the CEQA Guidelines.

AA-57 The EIR did not identify any significant impacts with regards to Land Use (Section 4.1), Transportation, Circulation, Parking (Section 4.2), or Visual Effects and Neighborhood Character (Section 4.12), for the reasons detailed within each section, respectively. Therefore, mitigation would not be required.

AA-58 Please see response to comment AA-47. Adherence to mitigation measure BIO-1 will ensure that impacts to raptors will be less than significant.
Ms. Elizabeth Shearer-Nguyen  
March 11, 2013  
Page 16

make observations. If raptors begin nesting, then all construction must stop pending noise attenuation studies and either distance buffers, noise barriers, or both need to be set up in order for any work to continue. If none of these prove sufficient, then work must discontinue until the young fledge and the birds move on.

The biological mitigation provides that: “If project grading is proposed during the raptor breeding season (February 1–September 15), the project biologist shall conduct a pre-grading survey for active raptor nests within 300 feet of the development area and submit a letter report to MMC prior to the preconstruction meeting…. If no nesting raptors are detected during the pre-grading survey, no mitigation is required.” However, the DEIR does not specify the length of time over which such a survey will be conducted, nor does it specify the date(s) during which it would be conducted, and how that might relate to the raptor nesting period. Insufficient or inaccurate prediction of disturbance to raptor breeding, nesting and/or pre-fledging of raptors on or within 300 feet of the development is therefore likely.

Conclusion

On behalf of Taxpayers for Responsible Land Use, I am reserving my right to raise additional concerns as the environmental analysis on this project progresses. Thank you for the opportunity to comment on the Draft Environmental Impact Report. Please contact me if you have any questions or need additional information.

Very truly yours,

[Signature]

Julie M. Hamilton  
Attorney for  
Taxpayers for Responsible Land Use

CC: Mayor Bob Filner  
Councilmember Sherri Lightner  
Project Manager John Fisher  
Client

June 21, 1977

Property Department – Attention: John Ryan

Engineering, and Development Department

Proposed Sale or Lease – Portion of Pueblo Lot 1299

We have no objection to the sale or lease of this property. However, it should be pointed out that access to the property is limited to La Jolla Scenic Drive only.

J. R. Crosby
Division Superintendent

EXHIBIT 1 (5 pages, including 3 references to the waiver of access from La Jolla Scenic Way, agreements from senior planner/developers, a proposal to develop the parcel, a list, and a summary of options for named properties and street names).
LETTER

May 27, 1977

FIO

EAC (Distribution)

Property Department

Proposed Sale or Lease - Port. of Pueblo Lot 1299

The City-owned land marked in red on the attached drawings, containing approximately 0.16 Acres (6356 square feet) is being investigated to determine its availability for sale or lease. The current zoning within the La Jolla Shores Planned District regulations is single family.

We request that you indicate any objections you may have to the disposal of this property. If you have comments to make, please indicate your name and department. No reply will be taken to mean no objection.

If present or future needs require that certain rights be retained, please indicate their nature and precise location within the boundaries of subject property.

Thank you.

John Ryan
Property Department

Proposed Attachment

Because of its location and size, it is not suitable for development. The City should retain ownership and maintain it as a landscaped traffic island.

Michael Stepner
Senior Planner
Planning Dept. Ph. 5793

RESPONSE

RECEIVED

JUN 7, 1977

PROPERTY DEPT.
March 6, 2013

TO: Ms. E. Shearer-Nguyen  
Environmental Planner  
City of San Diego Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101

FROM: Oliver W. Jones, M.D.  
8635 Cliffridge Ave.  
La Jolla, CA 92037-2113

RE: Comments relative to: UCSD Hillel Center for Jewish Life  
Project No. 212995/SCH No. 2010101030

Earlier today I submitted my comments regarding the recirculated DEIR for the UCSD Hillel Center for Jewish Life via an attachment to an e-mail sent to the DSDEAS@sandiego.gov address. The reason was because my computer printer was down and the deadline for submission of comments was rapidly approaching. Subsequently, I have been able to restore the printer hence a second submission enclosed with this letter. I hope the enclosed document arrives in time so the previous e-mail attachment will not have to be printed for review at the Development Services Center. The e-mail attached document and the one enclosed herein are the same.

Sincerely,

Oliver W. Jones

AB-1 This comment is an introduction to comments that follow. No further response is required.
February 28, 2013

TO: E. Shearer-Nguyen
   Environmental Planner
City of San Diego Developmental Services Center
1222 First Avenue, MS 501
San Diego, CA 92101

RE: Project Name: UCSD Hillel Center for Jewish Life
   Project No. 213995/2010101030
   Community Plan Area: La Jolla
   Council District 1

FROM: Oliver W. Jones, M.D.
       3855 Cliffridge Ave.
       La Jolla, CA 92037-2115

It is a privilege to respond to the recirculated draft Environmental Impact Report (DEIR). I have been able to obtain a copy of both the original DEIR and the recirculated draft for approximately $120.00. I received a written notice of document availability along with a deadline for receipt of written comments. The notification described the City of San Diego website where the DEIR could be reviewed but I did not receive information that the DEIR would be available for review at the downtown central library and the La Jolla community library. Others have had difficulty locating a source for review of this document. Most citizens would not be aware the DEIR was available for review at both the downtown and La Jolla libraries.

RESPONSE

AB-2 The City as Lead Agency followed all EIR noticing requirements under CEQA (Section 15087 of the CEQA Guidelines). The Notices of Availability of the Draft EIR were widely distributed to agencies, organizations, and individuals who were known to have an interest in the project. In addition, the notice was published in the San Diego Daily Transcript. The notices included a website indicating where the Draft EIR could be found.

In each version of the EIR, Section 1.3.1.1 stated the following:

The Draft EIR and all related technical studies are available for review during the public review period at the offices of the City of San Diego Development Services Department located on 1222 First Avenue, Fifth Floor, San Diego, California 92101. Copies of the Draft EIR are also available at the following public libraries:

- San Diego Public Library, Central Library, 820 E Street, San Diego, California 92101
- La Jolla Branch Library, 7555 Draper Avenue, San Diego, California 92037

This EIR is also available for review online at: http://clerkdoc.sannet.gov/Website/publicnotice/pubnoticeceq.html.

The City provided adequate notice of the EIR under CEQA.-
Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “. . . is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
With respect to the current use of the Cliffridge property, neither the Phase 1/Phase 2 project nor the Existing with Improvements Alternative is an office building, nor are they considered office uses. As discussed in Chapter 3, Project Description, the project entails a facility that would be used primarily for religious purposes, with space for religious learning, community-building, and spiritual counseling. This is an allowable use in the Single Family Zone.

As detailed in Section 3.0 of the EIR, the Cliffridge property is currently used to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD in accordance with the Hillel Articles of Incorporation (see response to Comment K-24). The Hillel staff at the Cliffridge property support the religious programs for the organization. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the City Municipal Code. The comment correctly states that a deviation would be required for the additional six parking spaces; however, a deviation is not required for a reduction in landscape/increase in hardscape. The FEIR has been revised to remove reference to this deviation.

As discussed in EIR Section 4.1.3.1(a), during Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut, instead of a 24-foot-wide curb cut for the Phase 1 site. The temporary parking area would provide parking for Hillel staff members during Phase 1. The proposed deviation would not result in secondary environmental effects. A Residential High Occupancy Permit is not required for either the Phase 1/Phase 2 project or the Existing with Improvements Alternative, as neither involve a residential component. This type of permit is required for a single dwelling unit with six or more persons 18 years of age and older residing for 30 or more consecutive days (see Section 123.0502 of the Municipal Code).

As an alternative to the proposed Phase 1/Phase 2 project, the Existing with Improvements Alternative is analyzed in Chapter 9.0 of the FEIR. Pursuant to CEQA the decision makers would be able to select an alternative in lieu of the proposed project.
With regards to precedent setting, Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

Issues relating to ownership do not raise any substantive issues relating to the adequacy or accuracy of the EIR. No further response is required.
As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.
As detailed in Section 3.1 of the DEIR, one of the project objectives is to “contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.” The Phase 1/Phase 2 project meets this objective. The southern portion of campus is preferred because of the close proximity to activities on campus. However, as detailed in Section 9.1 of the EIR, alternative locations were analyzed on more than just the south side of the UCSD campus.

CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not
reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.

The EIR did not identify any significant impacts with regards to Land Use (Section 4.1), Transportation, Circulation, Parking (Section 4.2), or Visual Effects and Neighborhood Character (Section 4.12) for the reasons detailed within each section. The EIR did conclude that there would be significant impacts associated with biological resources, noise, and paleontological resources. Therefore, the focus of the alternative selection was to reduce those impacts. The EIR is not required to address the effects of each of the considered alternatives for all topics, including land use, traffic, and visual/neighborhood character.

The Existing with Improvements Alternative is evaluated within the alternatives chapter of the FEIR. The alternatives identified in Chapter 9 are intended to avoid or substantially lessen significant effects of the project. The EIR addresses alternatives considered but rejected, as well as the No Project Alternative, the Reduced Project Alternative, and an alternate location known as the Site 675 Alternative. The Site 675 Alternative was determined to be a possible site for the Phase 1/Phase 2 project, and is analyzed in Section 9.2.4 of the EIR. Pursuant to CEQA, the decision makers would be able to select an alternative in lieu of the proposed project.

As detailed in Section 9.1 of the EIR, several alternate location options were analyzed for feasibility by MarketPoint when the Notice of Preparation was issued (2010), which in turn constitutes the baseline conditions for the project and alternatives analysis. The alternative site research included vacant lots, leasable facilities, flex space for sale, and shared space within a reasonable walking distance of the UCSD campus or along a UCSD bus line that encircles the university. Three potential locations were examined in this analysis.
The first site is at the corner of Genesee and La Jolla Village Drive. This is a vacant multi-acre site owned by Garden Communities. It is planned for four high-rise residential towers. The owners of the site intend to build on it when the economy improves and therefore it is not for sale. There are two other vacant sites, both at Judicial Drive and Executive Drive to the east of Genesee Avenue. One site is being planned for a high-rise hotel or combination condominium/hotel and the other is designated scientific/research. Neither of the sites is appropriate for a Hillel facility because the sites are far too large and are too distant from campus to meet the objectives of the project.

Development on these alternative vacant sites would not reduce the significant and mitigable impacts of the Phase 1/Phase 2 project, nor would these sites meet a majority of the project objectives.

The EIR identified significant (mitigated) impacts associated with biological resources, noise, and paleontological impacts. As detailed in Section 9.2.3 of the EIR, the intention of the Reduced Project Footprint on Vacant Parcel Alternative is to decrease the development footprint on the vacant parcel in order to reduce significant biological, noise, and paleontological impacts associated with the Phase 1/Phase 2 project.

The alternative was updated in the Recirculated EIR (December 2013) to be titled “Reduced Project Footprint on Vacant Parcel Alternative” in order to reflect that the intention of the alternative was to reduce potential impacts associated with the Phase 1/Phase 2 project. This alternative reduced the development footprint by removing one building, and reducing another to be one story instead of two. The intention of this alternative was to reduce grading, and thus reduce potential impacts associated with paleontological resources, and also to reduce the perceived visual impacts identified by those who commented on the NOP.

Although this alternative reduces the footprint, it would still involve some level of grading to provide landscaping where the building was located. While no site plan is provided, the analysis is based on description provided in Section 9.2.3 of the EIR.
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an eight-burner top, men’s and women’s lavatory/showers, all emphasize the social/cultural nature of the proposed project. Please explain how this does not confirm that the project will NOT be used primarily for religious purposes. In this light, a university-affiliated student center is not allowed in a single-family residential zone according to the LJSPDO. Hillel’s conversion of a single-family home into administrative office space also is illegal within the LJSPDO. Please help me understand what religious services occur presently in the home at 8976 Cliffridge Ave. As noted in a previous section, at least two of UCSD colleges, offer extensive course curriculum for study in Hebrew and Judaism.

3.2.2 Purpose and Activities Overview

This section serves to emphasize the proposed student center will not be used primarily for religious purposes, rather cultural and social responsibilities.

3.3.1 and 3.3.1.1 Phase I/Phase 2 and SDP

There is no mention of the La Jolla Shores Design Manual, a requirement for consideration of a Site Development Permit (SDP) under the LJSPDO. Moreover, an applicant may not pick and choose which aspects of the Design Manual they wish to apply—the entire manual must be applied. “Unity with variety” is the guideline and Hillel is proposing a student center in a single-family residential neighborhood on a previously undevelopable plot of land. This is direct conflict with the Design Manual. The proposed student center will have a gross floor area of more than 7000 feet consisting of 5 buildings clustered within an approximate center of the site. The roof, at its highest point will soar to a height of 30 feet. The center presents a wall of building some 146 ft. long, set back some 10 feet from the property line and directly across the street from several single-family homes. There are no homes in this area that come close to this scale, most homes are 2000 to 3000 sq. ft. The bulk and scale of the proposed student center overwhelmed neighborhood homes. Unity of structure in this neighborhood is completely disrupted. Please provide comments on any setback study for buildings in the proposed project. It appears having the student

rooms, as well as the outdoor courtyard space. The kitchen would be used to prepare traditional meals during religious holidays. Bathrooms are necessary for religious staff members and visitors. A shower is necessary to encourage bicycling to the site and a commonplace within facilities of this nature.

With respect to the allowable use at this location, see response to comment AB-3.

With respect to the current use of the Cliffridge property, see response to comment AB-4.

See response to comment AB-4.

See responses to comments AB-3 and AB-11.

The Phase 1/Phase 2 project is analyzed in relation to applicable LJSPD ordinance design regulations, including the La Jolla Shores Design Manual, within Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character). As analyzed in Section 4.1.4.1(a) the proposed Hillel Center for Jewish Life under Phase 1/Phase 2 would conform to these concepts of scale, environmental quality, preservation of character, harmony, originality and diversity, color, roof materials, and exterior wall materials.

The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual
AB-15 (cont.) appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

AB-16 The commenter is not correct as to the size and height of the proposed buildings. As detailed in Section 3.4 and of the EIR, the project would consist of the construction of three individual structures with a gross floor area of 6,479 square feet, situated around a central outdoor courtyard.

Additionally, as detailed in EIR Section 4.12.3.1(a), “Phase 2 building heights would range from 18 to 28 feet, and would be consistent with the LDC, Coastal Height Overlay Zone, and the Design Manual by not exceeding 30 feet.

AB-17 As detailed in EIR Section 4.12.3.1, the proposed retaining walls would be visible; however, they would be less than six feet in height from the proposed grade and screened with vegetation. The walls would be designed to be consistent with the Design Manual and would not impact the community character of the neighborhood. See also EIR Figures 3-12 through 3-14.

See also response to comment AB-15 for a detailed account of the project’s consistency with bulk, scale, and community character.

AB-18 The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.
LETTER

center 10 feet off the property line for some 145 ft. along La Jolla Scenic Drive N. is lack of consistency with setbacks for homes within the La Jolla Highlands neighborhood.

3.3.1.3 Street Right of Way Vacation

There is a lack of transparency as to the purpose of the Right of Way vacation. It is not, as stated in the RDEIR, “to enhance the pedestrian environment through construction of sidewalks and landscaping features”, it is rather because without a street vacation as proposed, it is unlikely the student center could be built on its proposed site. The RDEIR should not present such obviously misleading and incorrect statements such as this. Moreover, there is no description of what impact street vacation would have on traffic flow/parking along La Jolla Scenic Drive N.

I know City staff is well aware of findings for public right-of-way vacation approval, but I feel compelled to restate here.

“A public right-of-way may be vacated only if the decision maker makes the following findings:

(a) There is no present of prospective public use for the public right-of-way
(b) The public will benefit from the action through improved use of land made available by the vacation
(c) The vacation does not adversely affect any applicable land use plan or; and
(d) The public facility for which the public right-of-way was originally acquired will not be detrimentally affected by the vacation”

All four findings must be met in order to approve a street vacation for a public right of way. The Hillel project does not meet any of these findings. A street right-of-way vacation on La Jolla Scenic Drive N. would eliminate 6 on-street parking spaces on the cul-de-sac. This loss is in addition to 7 other lost parking sites due to the student center project seeking curb cut and entrance to the center parking area from La Jolla Scenic Way.

RESPONSE

AB-19 The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.
A street right-of-way vacation as proposed would narrow the street landscape on the 8900 block of La Jolla Scenic Dr. N. from 36 ft. wide to 34 ft. wide. Cars parked on both sides of this street already constitute a vehicular and pedestrian hazard. This would be accentuated with narrowing of the street. A stop sign at the intersection of Cliffridge Ave. and La Jolla Scenic Dr. N. is scarcely noticed by cars turning on to La Jolla Scenic Dr. N. This too increases the risk factor for collisions if the street is narrowed.

The San Diego City Planning Commission voted to deny the proposed street vacation in 2006 and again in 2008. There is no public benefit and significant public loss (parking) resulting from the proposed street vacation.

Transportation/Circulation and Parking

The RDEIR traffic/parking study fails to include all impacted streets. It is noted that in previous project presentations by Hillel, there was an agreement with USD the campus parking would be made available to students driving to the Hillel Student Center. That agreement ended a year or so ago and to my knowledge will not be renewed due to other impacts on campus parking.

The traffic flow study did not include impacts on Glenbrook Way and Cliffridge Ave. Moreover, it fails to mention added traffic flow from the Venter Institute currently under construction on the western side of Torrey Pines Road at the intersection of Torrey Pines Road North and La Jolla Village Drive. The Venter Institute will have 125 or so employees and currently the plan is for departing vehicles to exit the Venter campus onto Torrey Pines Road with a right turn only, moving south on Torrey Pines Road. Anyone desiring to drive north, will have to come to the intersection at Glenbrook Way, make a U-turn to return north on Torrey Pines Road. Those seeking to drive east on La Jolla Village Drive or to enter Gilman Drive from La Jolla Village Drive, would quite likely choose to turn left on Glenbrook then immediately left again on Cliffridge Ave. and drive on this residential street to avoid the very busy intersection at La Jolla Village Drive.

The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City's Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

This comment does not raise any substantive issues relating to the adequacy or accuracy of the EIR. No further response is required. However, the project is a Process Five decision which requires a recommendation from the Planning Commission prior to its ultimate determination by the City Council.

With respect to loss of parking, the construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.
The Phase 1/Phase 2 project would generate a total of eight peak hour trips. The City of San Diego does not require an analysis of roadways to which a project is forecasted to add less than 50 peak hour trips. Since the project would add less than this amount to Cliffridge Avenue and Glenbrook Way, an analysis of this roadway is not warranted.

No such agreement relating to on-campus parking exists at this time. At special events, a Parking Management Plan would be implemented to assure that adequate parking is available.

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for "churches and places of religious assembly." This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being "seats," "pew space," and/or "assembly area." The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.
Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
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Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2-9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.
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Here the RDEIR is misleading; it fails to state residencies on the east side of La Jolla Scenic Way are at an elevation considerably less than the site proposed for the Hillel project. Similarly the RDEIR fails to state the clustered “theater district” at UCSD, directly across La Jolla Village Drive from the proposed Hillel Student Center is screened from the proposed site and surrounding single-family residencies by higher elevation and extensive tree/vegetation growth. The RDEIR has chosen an improper baseline for comparison. Figure 4.12-3 is noted in the RDEIR for comparison purposes. Instead of including “Phase 2 Lot” as empty space, it is a more reasonable comparison if the proposed project buildings were superimposed on the open Lot. On the other hand, it is a fair statement that the bulk and scale of the proposed Center, if projected onto the Phase 2 Lot, would clearly demonstrate a significant difference from the surrounding single-family homes. This project proposal far exceeds the surrounding homes in bulk and scale and it would be just a start. Hillel has stated previously intent to expand in the future. With success in student recruiting by the organization there is doubt expansion would be an issue in the future and by definition further enhance the lack of conformity between the center and surrounding homes.

Summary

1. In general, the RDEIR appears to be highly selective on policies regarding land use, choosing only those that are more favorable to the proposed project but ignoring or rejecting all of the land use guidelines and objectives. This is not an even, transparent document.

2. The RDEIR does not provide evidence the proposed Student Center will be used primarily for religious activities. Statements in the document support the concept of a social/cultural center for UCSD students. Thus this proposed land use is in direct violation of the LJSFPO.

3. For the past 9 years, the home at 8876 Cliffridge Ave. has been converted to multiple office space for administrative duties for Hillel of San Diego, in direct violation of housing code in the La Jolla Highlands. On the other hand, this violation gives credence to the fact the other residents in

Potential visual impacts under the Phase 1/Phase 2 project are adequately analyzed in Section 4.12 of the EIR (Visual Effects and Neighborhood Character). The elevations of each building associated with the Phase 1/Phase 2 project are shown in Figures 3-12a and b. Phase 2 building heights would range from 18 to 28 feet, and would be consistent with the LDC, Coastal Height Overlay Zone, and the Design Manual by not exceeding 30 feet.

As detailed within Section 4.12.4.1(a), the site is visible from La Jolla Village Drive, a Primary Arterial roadway where 44,790 vehicles travel per day. Phase 1/Phase 2 was designed to “fit in” with the surrounding development and natural topography through considerations of height, bulk, signage, or architectural projections.

With respect to the project’s consistency with bulk, scale, and community character, see response to comment AB-15.

See response to comment AB-3.

The EIR provides an analysis of the project’s consistency with all relevant policies, plans, and ordinances. Specifically, Section 4.1 of the EIR includes a land use compatibility discussion focusing on the following: City’s General and La Jolla Community Plans, Land Development Code Regulations (including the Coastal Overlay Zone), La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual. As discussed therein, implementation of the Phase 1/Phase 2 or the Existing with Improvements Alternative would comply with all land use designations, goals, and policies, as well as all applicable development regulations. No direct or secondary effects would result and impacts were determined to be less than significant.

Additionally, Section 4.12 of the EIR provides an analysis of the project’s development features as they relate to City codes. Specifically, Section 4.12.3.1 details the project’s consistency with design guidelines related to organized appearance, bulk and scale, walls, and varied visual environment. Overall, it is determined that implementation of the Phase 1/Phase 2 or the Existing with Improvements Alternative would not result in a disorganized appearance inconsistent with relevant City codes, would not exceed height, bulk, or coverage regulations, would not construct walls in
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|        | **AB-31a (cont.)** excess of height or length maximums, and would not create a monotonous visual environment. Visual impacts would therefore be less than significant.  
See also response to comment AB-15. |
|        | **AB-31b** The EIR provides the details necessary to allow a finding that the project is a permanent space to be used primarily for religious activities, specifically to facilitate religious, spiritual, and intellectual growth. See response to comment AB-3 for a discussion of the allowance of this use within this location. |
|        | **AB-31c** See response to comment AB-4. |
the neighborhood could sell/donate their home to an organization similar to Hillel for the purpose of converting to a “center” or offices.

4. The RDEIR simply offers no findings to support a street vacation. Moreover there is ample evidence a street vacation provides no advantage/improvement for the residential neighborhood but increases traffic hazard.

5. Traffic analysis is deficient. It does not include traffic flow on Glenbrook Way/Cliffridge Ave. and does not mention added traffic flow from the Venter Institute. Inadequate consideration is given to the turn-in from La Jolla Scenic Way into the Student Center parking area.

6. The RDEIR offers misleading figures concerning the number of students expected to utilize the Student Center. It offers an unenforceable low figure of around 50 when the structure could accommodate nearly 6 times that number. Parking is inadequate even for the numbers presented in the DEIR thus impacting parking along residential streets in the neighborhood.

7. Figures provided in the DEIR provide ample evidence the proposed cluster of buildings at the Center are far out of character in bulk and scale with the residential neighborhood.

8. An RIR is expected to provide a reasonable range of alternative locations. What is found in the RDEIR fails to meet this requirement. Most of the “alternatives” are simply variations on the theme of the primary project, Phase 1/Phase 2. There is no map or other designation to show a reader just where Site 076 is located. Nothing is provided to establish that Hillel attendees all live and attend classes at the southern end of UCSD. There are possible alternatives near the campus not limited to the southern end.

I appreciate the opportunity to respond to this RDEIR.

Sincerely,

Oliver W. Jones, M.D.
This comment provides introductory information and does not raise any substantive issues related to the adequacy or accuracy of the EIR. No additional response is required.

With respect to the facility allowed at this location, Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “...is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

With respect to setting precedent, Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.
## LETTER

### AC-2 (cont.)

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

### AC-3

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.
Village Drive to avoid the already congested intersection of Torrey Pines and La Jolla Village Drive.

AC-4 - DEIR fails to analyze the impact to Glenbrook Way, as this street will likely (and already is) be used as a by-pass because of the construction of the Venter Institute and the right-turn only limitation out of the student center parking lot. The analysis fails to provide traffic volumes for existing conditions on Clifford Avenue and Glenbrook Way. Would this not be necessary for comparison of the future effects of the student center?

AC-5 - The alternative site given as a reasonable alternative by Hillel, #675, has no map included to identify it to the public. The DEIR fails to adequately describe or locate the site. One can only wonder why this site was not first choice. Its location would preclude crossing the major thoroughfare of La Jolla Village Drive.

AC-6 - Why does the analysis assume that 5,000 Jewish students are all on the south side of UCSD campus? Nothing documents this statement to support the specific need for a center located south of the campus.

AC-7a - The use of 8976 Clifford Avenue, currently used for Hillel’s administrative offices, is not allowed in the single-family zone of the La Jolla Shores Planned District. It would seem that Hillel should have petitioned for a variance, but has not. If a variance should be granted, and if Hillel abandons the property in the future, it will create a non-conforming residence. This is specifically disallowed in the Campus Impact Overlay zone. The house would then be vulnerable to use as an off-campus mini-dorm.

AC-7b - The DEIR fails to consider the impact of allowing a 6,500 sq. foot student center across a narrow road from low profile, low-density single-family residences.

AC-8 - The street, La Jolla Scenic Drive, is already a narrow, two-lane street, with parking on both sides and both auto and bicycle traffic. The proposed street vacation would narrow the street by two feet. Residents already report traffic accidents. Backing their cars out of their driveways into the street is already hazardous.

AC-9 - DEIR fails to consider the traffic impact and hazard by placing the entrance driveway within 150 feet of La Jolla Village Drive. Two left turn lanes merging from westbound La Jolla Village Drive onto southbound La Jolla Scenic Way; the lanes merge into one lane on La Jolla Scenic Way in the vicinity of the project driveway.

AC-10 - The Phase 1/Phase 2 project would generate a total of eight peak hour trips. The City of San Diego does not require an analysis of roadways to which a project is forecasted to add less than 50 peak hour trips as less than 50 peak hour trips would not be a considerably significant contribution to roadway impacts. Since the project would add much less than this amount to Glenbrook Way, an analysis of this roadway is not warranted.

As discussed in response to comment AC-3, the Venter Institute project is analyzed in the cumulative projects within the Recirculated EIR (December 2013).

AC-5 - The Recirculated EIR (December 2013) contains a map with the location of the Site 675 Alternative within Chapter 9, Alternatives (see Figure 9-1). As detailed in Section 9.2.4, development Site 675 Alternative would result in greater physical impacts to the environment when compared to the Phase 1/Phase 2 project, including to biological resources. Therefore, as this alternative would not reduce impacts associated with the project, it was rejected from further consideration.

AC-6 - The comment is an incorrect interpretation of the analysis. As detailed in Section 3.1 of the EIR, one of the project objectives is to "contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections." The Phase 1/Phase 2 project meets this objective. The southern portion of campus is preferred because of the close proximity to activities on campus. As detailed in Section 9.1 of the EIR, alternative locations were analyzed.

CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially
lesser any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.

AC-7a See response to comment AC-2.
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| AC-7b  | A variance is not part of either the proposed project or the Existing with Approved Alternative.  
Upon occupation of the new facilities under the Phase 1/Phase 2 project, the temporary use of the Cliffridge property would expire and revert back to single dwelling unit use. To identify subsequent ownership or residents of the Cliffridge property would be speculative and beyond the scope of the requirements of CEQA; however, there is no plan for the Cliffridge property to be used as an extension of the project.  

With regards to the cul-de-sac, the ROW vacation would be abandoned to provide landscaping, a pedestrian/cyclist parkway, and park-like amenities, and would not be utilized for parking as detailed in EIR Section 3.4.2.1(f). |
| AC-8   | The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant. |
The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

The traffic safety concerns would be less than significant.
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**Please note especially that the violations of the Municipal Code and La Jolla Shores Planned District Ordinance should inform the San Diego Planning Commission and The San Diego City Council that this project should be denied.**

Ms. Schearer-Nguyen, I would respectfully request that you take note of my comments.

Yours truly,

Paula B. Jones

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As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of
The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc.
Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

With respect to loss of parking, the construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project's contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

The project does not violate the Municipal Code nor any other plan, policy, or ordinance related to its use or development. The EIR provides an analysis of the project's consistency with all relevant policies, plans, and ordinances. Specifically, Section 4.1 of the EIR includes a land use compatibility discussion focusing on the following: City's General and La Jolla Community Plans, Land Development Code Regulations (including the Coastal Overlay Zone), La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual. As discussed therein, implementation of the Phase 1/Phase 2 would comply with all land use designations, goals and policies, as well as all applicable development regulations. No direct or secondary significant effects would result. Similarly as discussed in Section 9.2.1, no land use related impacts would occur under the Existing with Improvements Alternative.

The remainder of this comment expresses the opinion of the author regarding other religious institutions and inappropriateness of the project site but does not address the adequacy of the EIR.
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<td>AD-1</td>
<td>This comment provides introductory information and does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.</td>
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<tr>
<td>AD-2</td>
<td>As detailed in Section 4.2.4.1 of the EIR, the project only adds 58 ADT to the area roadways, less than the day-to-day fluctuation in traffic on La Jolla Scenic North. Therefore, there would be no significant impact on bikes and pedestrians. With regards to the safety of the project’s entrance, a project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.</td>
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<td>AD-5 As detailed in EIR Section 3.4.2.1(g): Enclosures for trash and recycling bins, utility equipment, mechanical equipment, ducts, elevator enclosures, cooling towers, or mechanical ventilators would be contained within enclosed portions of the buildings or portions of the parking area and would be screened with walls and/or landscaping. The project would comply with all applicable City regulations regarding the storage of waste and recycling bins.</td>
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<td>AD-6 With respect to the facility allowed at this location, Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “... is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”</td>
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RTC-247
As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

The current use of the Cliffridge property is similar in fashion to the proposed use. The pending code violation relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support the current use. The issue is intended to be resolved in connection with approval of the project.

Neither the Phase 1/Phase 2 project nor the Existing with Improvements Alternative is an office building, nor are they considered office uses. As discussed in Chapter 3, Project Description, the project entails a facility that would be used primarily for religious purposes, with space for religious learning, community-building, and spiritual counseling. This is an allowable use in the Single Family Zone.

As detailed in Section 3.0 of the EIR, the Cliffridge property is currently used to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD in accordance with the Hillel Articles of Incorporation (see response to Comment K-24). The Hillel staff at the Cliffridge property support the religious programs for the organization. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the City Municipal Code. The comment correctly states that a deviation would
AD-6 (cont.)

be required for the additional six parking spaces; however, no deviation is required for a reduction in landscape/increase in hardscape. The FEIR has been revised to remove reference to this deviation.

As discussed in EIR Section 4.1.3.1(a), during Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut, instead of a 24-foot-wide curb cut for the Phase 1 site. The temporary parking area would provide parking for Hillel staff members during Phase 1. The proposed deviation would not result in secondary environmental effects. A Residential High Occupancy Permit is not required for either the Phase 1/Phase 2 project or the Existing with Improvements Alternative, as neither involve a residential component. This type of permit is required for a single dwelling unit with six or more persons 18 years of age and older residing for 30 or more consecutive days (see Section 123.0502 of the Municipal Code).
The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

With respect to loss of on-street parking, the construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

With respect to the safety of cul-de-sac, as detailed in DEIR Section 4.2.5.1(a), vehicles may currently use the La Jolla Scenic Drive North cul-de-sac as a turnaround area. As shown in Figure 4.2-2 during the AM peak hour (highest hour between 7-9 a.m.), no vehicles turned into the cul-de-sac from La Jolla Scenic Drive North, and only two vehicles turned into the cul-de-sac from Cliffridge Avenue. Only seven vehicles turned into the cul-de-sac during the PM peak hour (highest hour between 4-6 p.m.).

Phase 1/Phase 2 would vacate the westerly cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. The vacation of the street right-of-way and street reconfiguration will provide pedestrian improvements at this location.

With respect to reducing the street width La Jolla Scenic Drive North The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a
LETTER

non-eater travelers to share the road safely. The street vacation would reduce the safety for all those transiting the street. Finding (a) cannot be made.

AE-3

The net impact on the public of a street vacation is negative. The loss of on-street parking in parking overlay zone is not accounted for in the DEIR. The added green space proposed in the development does not counterbalance the loss of parking and turn-around space for cars. Finding (b) cannot be made.

AE-4

Pages 71 through 77 of (La Jolla) UCSD Hillel Center for Jewish Life / Project No. 214995 / Draft EIR / App-A-NOP Comment Letters document decades of City land use planning, including planning documents signed by Mr. Mark Steele, designate the area as open space and not suitable for development. Finding (c) cannot validly be made.

AE-5

Traffic flow and traffic safety would be adversely affected on the 8900 block of La Jolla Scenic Drive. There is no evidence of increased safety for a street vacation. Finding (d) cannot validly be made.

Thank you for your consideration,

The Kusters

RESPONSE

AE-2 (cont.)

Local Street in the La Jolla Community Plan. Per the City's Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

AE-3 See response to comment AE-1.

AE-4 See response to comment AE-1.

AE-5 See response to comment AE-1.
With respect to the use allowed within the proposed location, Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose "... is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

With respect to precedent setting, Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.
While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, "Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD." As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.
The DEIR states:

"While there is a potential for other UCSD student religious organizations to seek off campus facilities in the project area, the constraints of finding a suitable site would be a limiting factor. The area in which the project is proposed is mostly developed, with UCSD and Scripps in close proximity to the project site as well as existing residential uses. Although there are small pockets of undeveloped land nearby, future development in this area is largely constrained by existing development, allowed uses, permitting and environmental review requirements, and the cost of acquiring land. Therefore, development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively."

In other words: precedent is set.

Money would be the only thing that could stop an interested organization from moving into the neighborhood and further encroaching on the single family residential neighborhood. We know the possibility of a powerful and bullying organization to push its way into such a neighborhood would increase with the development of this center, a Student Center that has no rights to be developed on the proposed site, when analyzing land use as defined by the City of San Diego for said location.

Thank you for your consideration.

Steve Kuster & Larsson

AF-2  See response to comment AF-1.
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<td>AG-1</td>
<td>This comment provides introductory information and does not raise any substantive issues related to the adequacy or accuracy or the EIR. No further response is required.</td>
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| AG-2   | The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.  

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.  

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections. |
| AG-3   | With respect to the project’s consistency with the community character of the neighborhood, the recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. |
Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

With respect to precedent, Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project does not propose an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.
The Phase 1/Phase 2 project would generate a total of eight peak hour trips. The City of San Diego does not require an analysis of roadways to which a project is forecasted to add less than 50 peak hour trips. Since the project would add much less than this amount to Gilman Drive, Cliffridge Avenue, Villa La Jolla, and Glenbrook Way, an analysis of these roadways is not required.

With respect to the Venter Institute as a cumulative project, the Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

As stated in EIR Section 4.2.1.2, there are currently Class II bicycle facilities along La Jolla Village Drive and Torrey Pines Road within the study area. However, there are no bicycle facilities provided along La Jolla Scenic Way and La Jolla Scenic Drive. The project would not result in traffic safety relating to bicyclists. The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.
With respect to noise, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m., and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. While additional visitors could be located within structures, the on-site noise sources anticipated from the project site would include activities at the courtyard and patios. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices within these exterior areas, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.

With respect to the Existing with Improvements Alternative, Hillel would permanently use the existing Cliffridge. The Noise Report prepared for the project (EIR Appendix G) based the evaluation of this alternative on a maximum of 50 speaking voices. EIR Section 9.2.1 concludes that noise related to on-site uses for the Existing with Improvements Alternative would be consistent with existing measured noise levels, and therefore would not be significant when compared to existing and future traffic noise levels.

Sections 4.8.3.1 and 4.8.3.2 have been revised to include a brief discussion of potential noise impacts associated with anticipated special events at the Hillel facility that could attract more than the general daily average amount of visitors. It was determined that impacts would be less than significant.

An acoustical report was prepared for the project in accordance with CEQA and City guidelines. With respect to the project’s noise compatibility, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound...
**LETTER**

**RESPONSE**

<p>| AH-3b (cont.) | levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m. and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels. |
| AH-3c | EIR Section 4.8 includes a discussion of noise impacts related to the congregation of people on the patio and outside areas of the project site. See response to comment AH-3b. Enforcement is assured through the City’s code enforcement process. |
| AH-3d | See response to comment AH-3b. |
| AH-3e | It is not anticipated that students would travel through the neighborhood. Most visitors to the facility would come via roadways or the pedestrian entrance. |
| AH-4 | The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces. Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR. With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant. |</p>
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CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.
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<td>The comment expresses the opinions of the commenter and does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response is required.</td>
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Ms. E. Shearer-Nguyen
Environmental Planner,
City of San Diego Environmental Services,
1222 First Avenue, MS 501, San Diego, CA 92101

Re: Draft Environmental Impact Report (DEIR)
SAP No.: 24000958
Project: 212995

Dear Ms. Shearer-Nguyen:
Please find attached my response to the DEIR (recirculated) for the Hillel Center for Jewish Life (HCJL). I have included supporting documents in an itemized appendix, and request that they be included as part of the record for my comments.

Yours Truly,
Sue Mookerjea
**LETTER**

ENVIROMENTAL IMPACT REPORT
Project No. 212995

AI-2a
Who is the owner/applicant for 8976 Clifford Avenue ("House")?

AI-2b
How will the City ensure that should Phase 2 be denied by the City Council, that the "owner/applicant" would abide by the conditions and return the property to a residential use should the "Existing with Improvements" option be approved as a default?

AI-2c
The "House" has been operating since 2003 in Notice of Code Compliance Violation (NCCV) [later stayed by Development Services Development (DSD) to facilitate the applicant's (n') combined project], as administrative offices by a national Jewish student organization. What guarantee does the City provide to the community that the process outlined in this document will be enforceable? (See later comments, and attached letter re: Notice of Code Compliance Violation, Item 1.)

AI-3
"The new facility would provide additional space for religious programs..." This description is inconsistent with that provided by the lead architect, Mr. Mark Steele, at the DEIR Scoping meeting of October 27th, 2010: "Also the project before had a room, a gathering space to be used for events and for religious services. That entire function is gone. It is no longer part of the facility. The facility is primarily simply a student center, study center, some office space, and that is no longer to be used for any major gatherings whatsoever (p.11)."

AI-4
"Phase 2 would involve development of the 0.8 -acre vacant parcel east of the Clifford Avenue property. Is the property area 0.8 acres, or .771 acres (33,567 sq. more or less? (Item 2: GRANT DEED. DOC # 2006-0911224.) I note this because there are several inconsistencies in this DEIR re: area.

AI-5a
Page 2
Can you please explain why the "Existing with Improvements Option" is bundled into this application? The "owner" for 8976 Clifford Avenue is not Hillel of San Diego – the owner of the vacant parcel. Surely for environmental review, the City would require the owner to prepare a development application, and proceed with the related environmental review hearings before the community planning groups, etc. The owner, as an individual, should be required to follow the process required by the City of all other residential property owners in that community. To bundle the owner of the "House" with Hillel of San Diego blurs the precedent setting potential action of allowing a tenant to secure a "non conforming use" of a property in a single family residential neighborhood governed by the La Jolla Shores Planned District Ordinance (LJSDPO), amongst other Codes.

AI-5b
Page 2

AI-5c
ALTERTNATIVES
No Project Alternative

AI-6a
Page 4

**RESPONSE**

A1-2a
Ownership is not a CEQA-related issue. This comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response on this issue is required.

A1-2b
Upon occupation of the new facilities under the Phase 1/Phase 2 project, the temporary use of the Clifford property would expire and revert back to single dwelling unit use. To identify subsequent ownership or residents of the Clifford property would be speculative and beyond the scope of the requirements of CEQA; however, there is no plan for the Clifford property to be used as an extension of the project.

With regards to the cul-de-sac, the ROW vacation would be abandoned to provide landscaping, a pedestrian/cyclist parkway, and park-like amenities, and would not be utilized for parking as detailed in EIR Section 3.4.2.1(f).

A1-2c
The EIR requires conditions of approval as part of the certification process. Upon project approval, or approval of a CEQA Alternative the current code violation would no longer exist.

A1-3
Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose ". . . is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
The project represents a religious use which, like other churches, temples, and places of worship, would inherently include some accessory uses, which are considered part of the primary use. As detailed in Section 3.4.2 of the EIR, the proposed project would include multiple component parts which support the primary use of project (see response to comment I-1). Besides the library/chapel, religious activities would take place in the lounge and meeting rooms, as well as the outdoor courtyard space. The kitchen would be used to prepare traditional meals during religious holidays. Bathrooms are necessary for religious staff members and visitors. A shower is necessary to encourage bicycling to the site and a commonplace within facilities of this nature.

Section 3.4.2.1 of the Recirculated EIR (December 2013) was updated to clarify the acreage of the project site. The EIR provides an accurate project description (see Chapter 3) in accordance with the requirements of Section 15124 of the CEQA Guidelines. Specifically, the existing vacant lot upon which the project is proposed is a total of 0.80 acre. The project also includes a ROW vacation which would add an additional 0.49 acre to the project site. Therefore, upon project approval, the total site would be 1.29 acres. See EIR Figures 3-1 (size and location of ROW vacation) and 3-3 (final boundaries of the project site).

The FEIR has been revised to include all discussions related to the Existing with Improvements Alternative within the alternatives chapter of the document. This provides clarity for the reader. Specifically, Section 9.2.1, provides a full analysis of this alternative.

The Cliffridge property was donated to Hillel for use until the Phase 1/Phase 2 project was approved or completed. It is acknowledged within the EIR that if the Existing with Improvements option were selected instead of the proposed project, improvements to the property would be required. The EIR adequately analyzes the potential impacts under the Existing with Improvements Alternative.

The permit process does not require that the owner of the property submit the applications.
AI-5c  Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

AI-6a  Neither the Phase 1/Phase 2 project nor the Existing with Improvements Alternative is an office building, nor are they considered office uses. As discussed in Chapter 3, Project Description, the project entails a facility that would be used primarily for religious purposes, with space for religious learning, community-building, and spiritual counseling. This is an allowable use in the Single Family Zone.
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<td>As detailed in Section 3.0 of the EIR, the Cliffridge property is currently used to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD in accordance with the Hillel Articles of Incorporation (see response to Comment K-24). The Hillel staff at the Cliffridge property support the religious programs for the organization. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the City Municipal Code. The comment correctly states that a deviation would be required for the additional six parking spaces; however, no deviation is required for a reduction in landscape/increase in hardscape. The FEIR has been revised to remove reference to this deviation.</td>
<td></td>
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<td>As discussed in EIR Section 4.1.3.1(a), during Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut, instead of a 24-foot-wide curb cut for the Phase 1 site. The temporary parking area would provide parking for Hillel staff members during Phase 1. The proposed deviation would not result in secondary environmental effects. A Residential High Occupancy Permit is not required for either the Phase 1/Phase 2 project or the Existing with Improvements Alternative, as neither involve a residential component. This type of permit is required for a single dwelling unit with six or more persons 18 years of age and older residing for 30 or more consecutive days (see Section 123.0502 of the Municipal Code).</td>
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The Existing with Improvements project is an alternative project consistent with CEQA Guideline Section 15126.6. However, as such, it would only be required to be analyzed at a lesser degree than the proposed. In order to provide a detailed analysis and comparison of impacts, the Existing with Improvements Alternative was analyzed at the same level of detail as the proposed project and was, therefore, presented throughout the document (rather than just in the Alternatives chapter).

The No Project Alternative represents the scenario where no project would be approved and the existing condition would remain. As a CEQA alternative, this was analyzed in lesser detail than the proposed (and the Existing with Improvement Alternative). The analysis of the No Project Alternative would not require any additional environmental analysis. It is unclear what is meant by the commenter that CEQA would be suspended. The requirements for disclosure remain under the relevant CEQA and CEQA Guidelines sections. Mitigation for the No Project Alternative is not deferred, as no impacts would occur and no mitigation would be required under this alternative (see Chapter 9 of the FEIR).

The evaluation of the No Project Alternative constitutes the environmental review required for the scenario where no project is constructed. Because the No Project Alternative represents the existing condition, no new impacts would occur.

This comment represents an opinion as to what could occur on the project site. It is beyond the scope of the EIR and no additional response is required.

The project is not requested nor subject to spot zoning. The use proposed is allowed in the zone. See response to comment AI-3.

The alternative was updated in the Recirculated EIR (December 2013) to be titled “Reduced Project Footprint on Vacant Parcel Alternative” in order to reflect that the intention of the alternative was to reduce potential impacts associated with the Phase 1/Phase 2 project. This alternative reduced the development footprint by removing one building, and reducing another to be one story instead of two. This alternative would reduce grading, and reduce potential impacts associated with paleontological resources.
As described in Section 9.2.3 of the Final EIR, the development footprint for the Reduced Project Footprint on Vacant Parcel Alternative would be reduced compared to the proposed project (Phase 1/Phase 2). The Final EIR has been updated to remove the statement that the footprint of this alternative would be 1.34 acres. The development footprint would be reduced on the vacant parcel from three to two structures, approximately 33 percent compared to the proposed project (Phase 1/Phase 2). The 1.34 acres referenced in the EIR was the total acreage of both the vacant parcel and the Cliffridge property, as this alternative would continue to use the Cliffridge site as an administrative facility associated with the religious use. While the facility on the vacant parcel would be reduced, this alternative does not propose to remove the library/chapel.
The Reduced Project Footprint on Vacant Parcel Alternative would provide fewer spaces as the square footage of the new buildings would be reduced.

With respect to specific amount of parking being provided, Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “churches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they...
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<td>AI-7b</td>
<td>would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces. Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant. In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated. At completion of the project, there would be no non-conforming uses. The facility on the vacant parcel would be constructed pursuant to all mitigation measures and conditions of project approval. The Cliffridge property would be brought up to all applicable code requirements for the intended use and occupancy.</td>
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<td>AI-7c</td>
<td>The analysis of this alternative is based on the description in EIR Section 9.2.3. See also Table 9-1 for a comparison of the alternative to the proposed project.</td>
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<td>AI-7d</td>
<td>The project plans have evolved and changed since its presentation in 2002. The comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response is required.</td>
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| Al-8a  | The Site 675 Alternative was determined to be a possible site for the Phase 1/Phase 2 project, and is analyzed in Section 9.2.4 of the EIR.  

As discussed in Section 9.2.4, Site 675 has the potential to support sensitive biological resources and paleontological resources, and is located adjacent to a heavily traveled roadway (La Jolla Village Drive), which in turn causes noise impacts. Therefore, it can be reasonably assumed that the Site 675 alternative would not reduce impacts associated with the Phase 1/Phase 2 project.  

Although the project is intended to provide religious facilities for UCSD students, it is not affiliated with UCSD. The project site is located within the City of San Diego, and is under the jurisdiction of the City of San Diego.  

As required under CEQA Guidelines Section 15126.6, the EIR considers and discusses a range of reasonable alternatives. As required pursuant to CEQA Guidelines Section 15126.6(a), these alternatives were selected to provide a reasonable range of possible project designs or locations, which could feasibly attain most of the basic objectives of the project, but potentially avoid or substantially lessen significant effects of the project.  

See response to comment Al-6b. In addition, the alternatives identified in Chapter 9 are intended to avoid or substantially lessen significant effects of the project. The EIR addresses alternatives considered but rejected, as well as the No Project Alternative, the Reduced Project Alternative, and an alternate location known as the Site 675 Alternative. |
| Al-8b  | While other options may exist, the EIR studied a “reasonable range of alternatives” as required under CEQA. Specifically, CEQA Guidelines Section 15126.6(a) states:  

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. |
Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

With respect to potential buyers of the project site, the comment does not raise an issue related to any substantive issues or to the adequacy and/or accuracy of the EIR. No further response is required.

The project objectives detailed within the EIR include the underlying purpose of the project and are clearly written in order to help the lead agency develop a reasonable range of alternatives to evaluate, as required within Section 15124(b) of the CEQA Guidelines. The project objectives are not “overly defined and narrow” as the commenter states.

The comment provides excerpts from the University Community Plan and does not raise an issue related to any substantive issues or to the adequacy and/or accuracy of the EIR. No further response is required.
GENERAL AREA SETTING

Internally, the University community planning area is characterized by its dominant existing uses, its topography and its major environmental constraints. Taken together, these factors will continue to control the development of the community.

I. DOMINANT EXISTING USES

Historically, UCSD has been the focal point of the community. Its continuing evolution has established much of the scale, intensity and pace of private development in the community. A second major focus has been developed in the form of the University Towne Centre, which functions as a major regional commercial center as well as a social center for the community. The research, corporate headquarters and medical centers in the northern portion of the planning area, the major parkland resources of the Torrey Pines, Rose Canyon and San Clemente Canyon areas, and the urbanized South University residential area make up the other major existing uses in the community.

II. TOPOGRAPHY

The landform of the University community planning area is highly varied, consisting of such major topographic features as coastal bluffs, canyon systems, areas of rolling topography and mesa tops. The coastal bluffs are the most scenic landform in the community and lie entirely within the Torrey Pines State Reserve and Torrey Pines City Park. Major canyon systems in the community include Sorrento Valley, Soledad Canyon, Rose Canyon and San Clemente Canyon. In the vicinity of the Towne Centre, the topography is a series of side canyons and rounded ridges which form the transition from the more pronounced major canyons to the mesa tops which generally lie in the vicinity of Miramar Road, north of University Towne Centre and north of UCSD.

III. ENVIRONMENTAL CONSTRAINTS

The environmental constraints which exist in the University community planning area originate from both natural and man-made sources. Major natural constraints are imposed by the habitat and scenic values of the slope areas associated with the coastal zone and the canyon open space systems. Significant man-made constraints include the overflight impacts associated with MCAS Miramar, limitations on access and traffic handling capability and air quality considerations.
B. MCAS Miramar Overflight Impacts

Land use proposals, in addition to the Noise and Safety Elements of the Community Plan Draft, have been prepared in conformance with the Airport Land Use Compatibility Plan for MCAS Miramar. The plan references the Federal Government's easement acquisition and enforcement program as a controlling land use planning factor in the areas both east and west of Interstate 805.

C. UCSD Long Range Development Plan

This Plan more fully recognizes the importance of UCSD in the community by considering on-campus uses as designated by the University's Long Range Development Plan (LRDP) and by seeking to provide appropriate linkages and design interfaces between the campus and the community. The Plan includes uses that are supportive of the University's basic goals of instruction and research.

D. Urban Design

An Urban Design Element has been added to the Plan, enhancing and replacing the Subarea Elements which were designated in the 1983 community plan for the purpose of defining land uses and design standards. This element provides a more flexible framework of the University community and recommendations to achieve that vision. The Community Plan Implementation Overlay Zone (CPIOZ) has been applied to implement the urban design guidelines as well as the Development Intensity Element. The Development Intensity Element identifies properties to be reviewed under the CPIOZ.

E. Housing/Community Balance

In accordance with the Housing Element of the General Plan, proposals in the Plan for the development of affordable housing within the community are consistent with the new proposals contained in the UCSD Local Coastal Program Land Use Plan. The Planning Commission and City Council adopted these proposals affecting the Coastal Zone in March 1983.
C. Balanced Community

1. To achieve economic balance: a) provide very low-, low- and moderate-income affordable assisted housing through the development or exchange of City-owned lands (a potential site is that portion of the Pueblo land south of Nobel Drive designated for residential use); b) provide Density Bonus of up to 25 percent for low- and moderate-income housing pursuant to the City’s Affordable Housing Density Bonus Program; c) provide affordable housing as part of future development agreements, planned development permits, and other projects requiring discretionary reviews; d) consider the provision of single-room occupancy (SRO) and living units as part of future units targeted to low- or very low-income households; and e) provide rent subsidies pursuant to available state and federal housing programs.

2. To achieve ethnic balance: a) require affirmative marketing program as a condition of tentative map approval; and b) review performance of project developer and associated financial institution, and provide negative reports to regulatory agencies.

3. To achieve balanced housing tenure: a) provide assisted rental housing opportunities and preserve existing nonprofit senior citizen housing under Conditional Use Permits; and, b) provide a range of housing types which are suitable for rental within large-scale Planned Residential Developments.

D. Special Populations

1. To respond to the needs of students in the community: a) encourage the private development of low-income housing within two miles of the UCSD Campus and the University’s plans for development of student housing on campus; b) allow off-street parking ratios of one space for each two bedrooms through implementing Conditional Use Permits and where location appropriate, with respect to the campus, community commercial centers and transit; c) encourage larger residential units providing two or more bedrooms for student housing; and (d) provide bonus density for affordable assisted housing projects.

E. Mobile Homes/Manufactured Housing

1. The Housing Element recommends that two percent of all new housing in the City be manufactured housing. To meet this goal in the University community would require a total of (566) manufactured units. Such a number of units could be accommodated in the City-owned properties lying outside the 65 CNEL contour of MCAS Miramar and north of Nobel Drive.
AI-10 The comment provides background information but does not raise an issue related to the substance or adequacy of the EIR. No further response is required.
LETTER

VIA HAND DELIVERY

GARY HALBERT
DEVELOPMENT SERVICES DEPARTMENT

Dear Mr. Halbert:

Hilltop Project 6098

Legal issues have been raised regarding the Hilltop Project 6098. I have analyzed those issues and concluded that the environmental analysis for the Hilltop Project is not in compliance with the California Environmental Quality Act (CEQA). In order to bring the Hilltop Project into compliance with the law, an Environmental Impact Report must be prepared to properly inform the public and the decision makers about the significant adverse environmental impacts of the project. In particular, parking impacts are not adequately mitigated and, therefore, a Mitigated Negative Declaration is not appropriate in this case.

Sincerely yours,

MICHAEL J. AGUIRRE, City Attorney

cc: Keri Katz, Assistant City Attorney
    Karen Neuman, Assistant City Attorney
    Ann Noon, Assistant City Attorney
    Carrie Gleason, Chief Deputy City Attorney
    Douglas Humphreys, Deputy City Attorney
    Shannon Thomas, Deputy City Attorney

RESPONSE

RTC-279
August 9, 2005

Ms. Lynne Heidel
Allen Matkins
561 West Broadway, 9th Floor
San Diego, CA 92101

Dear Lynne,

Subject: Hillel of San Diego

Please be advised that Development Services has received the enclosed letter from City Attorney Michael Aguirre, dated August 5, 2005, in regard to the environmental review for the Hillel of San Diego project application No. 6098.

Sincerely,

[Signature]

[Title]
Development Services
RMK/12b
Enclosure - City Attorney Letter
From: Stricker, Dan
Sent: Tuesday, August 06, 2008 4:03 PM
To: Westlake, Mike
Subject: Hilda, Project No. 149437

The Environmental Analysis Section has determined that the appropriate environmental document for the subject project is a Mitigated Negative Declaration (MND). Unless otherwise directed, staff will continue drafting the MND and preparing it for public review. Should you have any questions, please contact me or Allison Strocvold.

Thanks,

Dan

Daniel Stricker
Development Project Manager
Affordable/Infill Housing & Sustainable Buildings Expedite Program
City of San Diego
Development Services Department
1222 First Avenue, M.S. 501
San Diego, CA 92101
(619) 446-5251

Please visit our website at http://www.sandiego.gov/development-services/
With respect to anticipated programs and attendance, as stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

The project has been revised and refined since 2008. The current occupancy load pursuant to the San Diego Fire Code is 270 persons.

See responses to comment AI-12. The traffic assessment is based on a total of 100 visitors throughout the day. This assumes the use of both interior and exterior portions of the project site.

See response to comment Al-14.

As detailed in Chapter 1, the purpose of an EIR is to:

- Inform decision-makers and the general public of the potential environmental consequences that may result from the approval and implementation of the project; and to
- Identify mitigation measures and project alternatives that are available to avoid or reduce potential significant environmental impacts.

Thus, the decision-makers (in this case, the City Council), will determine whether the entire EIR is adequate, and if the project
should be approved. The section identified by the commenter (S4 within the Executive Summary) identifies those issues that would be resolved by the City Council, including whether, as stated throughout the EIR, significant impacts associated with the environmental issues of biology, noise, and paleontological resources would be fully mitigated to below a level of significance. Page 1-5 provides an introduction to the contents of the EIR. The commenter seems to be questioning why only those listed issue areas (see EIR Section 1.4.1) are included for full analysis. Those identified areas are included in Chapter 4 of the EIR because through the scoping process it was determined that the project could result in significant environmental impacts associated with these areas. Issue areas found not to be significant area discussed in Chapter 8 (Effects Found Not to Be Significant). Overall, the EIR provides an adequate discussion of all CEQA related issues.
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<td><strong>AI-16</strong></td>
<td>Figure 2-2 within the EIR is a USGS topographic map, as identified in the sourcing of the figure. USGS maps are “historic” maps that have been digitized, and cannot be modified. Issues relating to La Jolla parkland are not relevant to this project.</td>
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| **AI-17** | The project site includes the Cliffridge property and the vacant site, referred to as Site 653 by the commenter. The “past grading activities” is meant to refer to the vacant site, while the “residential development” is intended to refer to the Cliffridge property.  

With respect to the project site’s designation as open space, there is no such requirement and the commenter does not provide evidence of such requirement. The project site is owned by Hillel. |
| **AI-18** | The City of San Diego maintains several layers of land use policy. The General Plan establishes broad land use categories for all areas within the City limits. The City’s General Plan land use designations may be further defined through community plans, which provide more refined land use categories relevant to their respective communities. With respect to the project site, the General Plan designates the vacant parcel as “right-of-way” and “park, open space, and recreation.”  

The project site is further designated as “low density residential” by the La Jolla Community Plan. Therefore, there are a total of two land use designations associated with the project site. |
| **AI-19** | The discretionary actions required for the Phase 1/Phase 2 is included in this section. As with all acronyms, each are spelled out in their entirety, followed by the acronym, upon their first usage. Additionally, a list of all acronyms used throughout the EIR is included after the Table of Contents. |
| **AI-20** | The plans and diagrams provide detailed illustration. With respect to the specific questions in this comment, note the following: |
| **AI-21a** | • Project Boundary: As shown in Figure 2-3, the project site is bounded by La Jolla Village Drive to the north, La Jolla Scenic Drive N to the east, and Torrey Pines Road to the west.  

• As detailed in Section 3.4.2.1, the project site is currently 15,350 square feet. After approval of the ROW vacation, the project site would total 33,541 square feet. |
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<td>AI-20</td>
<td>There is currently no sidewalk leading from the intersection of North Torrey Pines Road and La Jolla Village Drive to the project site. The Phase 1/Phase 2 project would enhance the pedestrian environment in this area as detailed in EIR Section 3.3.1.3, stating:</td>
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<td>As shown in Figure 3-1, Phase 1/Phase 2 proposes to vacate the cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. The purpose of the street ROW vacation is to enhance the pedestrian environment through construction of sidewalks and landscaping features.</td>
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<tr>
<td>AI-21a</td>
<td>See response to comment AI7b.</td>
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<td></td>
<td>The last paragraph of this comment does not raise an issue related to any substantive issues or to the adequacy and/or accuracy of the EIR. No further response is required. No further response is required.</td>
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<td>AL-21b</td>
<td>See responses to comments AI-3 and AI-6e.</td>
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<tr>
<td>AL-21c</td>
<td>The project does not result in deferred mitigation. All impacts are disclosed and mitigation required to reduce significant impacts discussed and included in the project Mitigation Monitoring and Reporting Program.</td>
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<td>AL-21d</td>
<td>The comment provides background information on the voting patterns of the. No further response is required.</td>
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<tr>
<td>AL-22</td>
<td>With respect to space on campus, it is understood that due to the nature of the project’s use (see above) UCSD has told Hillel that Hillel cannot have permanent or long-term space or use on campus.</td>
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<tr>
<td>AL-23a</td>
<td>See response to comment AI-21c.</td>
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<tr>
<td>AL-23b</td>
<td>A CUP would not be required as the project would be an allowable use within the LJPSPDO.</td>
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<td>AL-23c</td>
<td>Leasable facilities, flex space for sale, and shared space were considered but rejected as alternatives to the project in Section 9.1 as they would not meet a majority of the project objectives, as detailed therein. See also the response to comment AI-22.</td>
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<td>AL-23d</td>
<td>Traffic and noise impacts are adequately analyzed in EIR Sections 4.2 and 4.8, respectively. Each section provides modelling and a detailed analysis associated with potential increases in traffic and noise. As concluded with each respective section, no traffic impacts would occur and noise impacts would be reduced to less than significant through the implementation of mitigation measures.</td>
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<tr>
<td>AL-23a</td>
<td>While it is unclear what was specifically told to the residents, the proposed facility represents an allowed use within the zone (see response to comment AI-3) and therefore a CUP would not be required.</td>
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<td>AL-23b</td>
<td>Specific events associated with the facility are discussed in Chapter 3. Potential impacts associated with these events are analyzed throughout the document. All significant impacts identified would be reduced through the implementation of mitigation measures.</td>
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<tr>
<td>AL-23c</td>
<td>With respect to locating the facility elsewhere, see EIR Section 9.1.</td>
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<td><strong>AI-24</strong></td>
<td>The discussion of proposed landscaping was updated in the Recirculated EIR (December 2013). Section 3.4.2.1(j) provides a detailed narrative of the landscape concept including within the courtyard/inner yard, along the proposed bicycle/pedestrian path, parking lot, and sidewalks. Additionally, Figures 3-10 and 3-11 illustrate the proposed concept plan in detail, complete with proposed plant palette. With specific respect to landscaping square feet: EIR Section 4.1 states that the proposed lot coverage for Phase 2, with the landscaped area, would be 15.8 percent (5,291 square feet divided by 33,541 square feet). The lot coverage without the landscaping would be 22.5 percent.</td>
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<td><strong>AI-25</strong></td>
<td>The site is privately owned and although not currently developed, not available as public space. The proposed project (Phase 1/Phase 2) would dedicate space for the public’s use through the ROW vacation. As detailed in EIR Section 3.4.2.1(f) public sidewalk/pedestrian pathway would be constructed, enhancing the corner of Torrey Pines Road and La Jolla Village Drive. Additionally, the path would continue through the site to connect with La Jolla Scenic Drive North available for pedestrians and bicycles. The pathway would include benches, trash receptacles, and a drinking fountain all for the benefit of the public.</td>
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<td><strong>AI-26a</strong></td>
<td>EIR Section 4.2.3.1(a) of the Recirculated EIR (December 2013) analyzed potential traffic impacts associated with construction. With regards to trips associated with grading, the EIR states the following, “trucks hauling export materials can carry up to 20 cubic yards (cy) per truck. Assuming 3,600 cy are exported from the site with 20 cy per truck over the course of 5 days, approximately 36 inbound trucks would access the site per day during the grading period generating 72 daily truck trips.”</td>
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<td><strong>AI-26b</strong></td>
<td>A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to- southbound left turn from La Jolla</td>
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Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.

With respect to the safety of U-turns, EIR Section 4.2.5.1(a) states the following:

Outbound traffic oriented to La Jolla Village Drive would make a southbound to northbound U-turn at the intersection of La Jolla Scenic Drive North and Caminito Deseo. A field observation of the available turning radius at Caminito Deseo was compared to the required minimum design internal turning radius of 36 feet. Based on the field visit under existing roadway conditions, it was observed that 40 feet of internal turning radius is available. Therefore, a U-turn is feasible at this intersection. Although a U-turn is feasible, additional traffic measures would be required to prevent potential conflict between U-turning vehicles and vehicles making a westbound to northbound right turn from Caminito Deseo onto La Jolla Scenic Drive. The traffic study recommends the installation of a stop sign on Caminito Deseo approaching La Jolla Scenic Drive.

Therefore, potential traffic safety concerns noted by the commenter related to U-turns were found to be less than significant, as detailed in EIR Section 4.2. A maximum of seven vehicles are expected to perform the U-turn during the PM peak hour.
3.6.1 Previous Project History

Rather than respond line by line to this section, I have listed a timeline of events based upon City records, communication with City Staff from community members, and material presented at planning group meetings. I have attached all of the documents as Item 4 Request for Proposals (RFP). These documents should be available/know to City Staff, and have been referenced at various times in letters/emails/personal meetings with the following people to my personal knowledge:

City Attorney: Mr. Casey Gwinn
City Attorney: Mr. Michael Aguirre
Council member: Mr. Harry Mathis
Council member: Mr. Scott Peters
Mayor: Ms. Susan Golding
Mayor: Former Justice, Richard Murphy
Mayor: Mr. Jerry, Sanders
City Manager: Mr. Michael Uberuaga
City Manager: Mr. Lamont Ewell
READ: Mr. William Griffith
City Staff: Ms. Lucille Griffith
City Staff: Mr. Shahriar Afshar
City Staff: Mr. Mike Tudury
City Planner: Mr. Bob Manis
City Staff: Mr. Robert Korsh

Question: If the communications record, including digitally recorded Planning Commission and Council hearings, is so complete, why has the RFP process been presented in conflict with the substantial record in the City of San Diego (including institutional memory)?

Or, is the record as presented to the community different from that known by the City of San Diego decision-makers. Either way, there is a problem that obscures essential inquiry into the CEQA process.

*January 27th, 1999: Confirmation letter to Ms. Lucille Goodman of READ, from board members of Hillel, an International Organization, for a meeting re: Parcel 26 on San Diego County Assessor’s Map, Book 344, Page 12.

*June 10th, 1999: A letter from Councilmember Harry Mathis to William T. Griffith (READ), “I would like to request that Real Estate Assets staff work with Planning and Development Review staff and the community to ascertain if this lot could be leased or sold to a private organization for use as a student center.” (My emphasis.)
LETTER

*July 15th, 1999: This email starts to document the confusion around the status of the property. Again, not a religious use at all, but “social, cultural, etc.. support to an ethnic community.”

*July 16th, 1999: READ continues to present an inaccurate representation of the zone and the compatible use of a student center. (N.B. None of the community groups ever approved the lease or sale as a student center. See Mr. Mark Lyon [as Chair of La Jolla Community Planning Association] in oral testimony at the November 20th, 2000, City Council meeting.)

March 24th, 2000: Letter to Councilmember Kehoe from Hillel of San Diego re: pending Land Use and Housing meeting of April 12th, 2000. In this letter it is clear that Hillel of San Diego has been involved with the City since 1997.

April 11th, 2000: A letter of interest from a representative of the Lutheran Center.

April 12th, 2000: Land Use and Housing committee, a sub committee of the San Diego City Council meets.

April 26th, 2000: Hillel of San Diego suggests an estimate for the land based upon an analysis by MarletPoint Realty Advisors.

April 27th, 2000: Letter to the representative of the Lutheran Center acknowledging his interest. This is after the L.U & H meeting where Hillel has presented its proposal.

May 8th, 2000: TBNC representative expresses interest in the RFP.

May 9th, 2000: Letter of interest from Marum Associates.

May 18th, 2000: RFP is advertised in La Jolla Light: (Note: The deadline is June 5th, 2000.)

June 5th, 2000: The homeowners submit a proposal for a landscaped park area that is consistent with the 1995 La Jolla Community Plan (for areas outside the Coastal Zone) Open Space Designation.

No docs attached for this, all are in the City Record

Voting record of community planning groups to oppose the sale or lease of Site 653:
May 30th, 2000: Parks and Beaches
La Jolla Shores Association, May 30th, 2000
Land Use Committee of the La Jolla Town Council, June 6th, 2000
La Jolla Town Council, June 8th, 2000
La Jolla Shores Advisory Board, June 20th, 2000

RESPONSE
As required under CEQA Guidelines Section 15125(a):

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published.

The NOP was published on October 8, 2010. Therefore, the baseline conditions are adequately described, and conditions prior to that date (i.e., in the year 2000) are not applicable according to CEQA. The history of the project is summarized in Section 3.6 of the EIR.

With respect to the project site’s designation as open space, the proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

With respect to the reduction in on-street parking, The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.
### LETTER

The La Jolla Community Plan for the areas outside the Coastal Zone had already been certified when Site 653 was bifurcated from the La Jolla Community Plan hearing in May 2002.

(If I have included annotated sections of the official transcript that are specifically relevant to the failure of the City of San Diego, the City Attorney, and the majority of the City Councilmembers to comply with the California Environmental Quality Act and the City's own process for land development, and the City's process for the certification of environmental documents.)

The Site 653 bifurcation was without notice to the residents and the community planning groups who could not have foreseen that the community's representation that day was to be ceded to former councilmember Ralph Hranitzky.

2003: A document that was too late for the residents' court case was obtained by their attorney. Francis M. Devaney, an attorney in the Civil Division of the San Diego City Attorney, stated: "... that the City agreed with his client's position that City staff erred when advising the City Manager that Site 653 was designated as single-family residential property. Based upon such advice the City Council acted on November, 2000. Mr. Brechtel and I agreed that on such date Site 653 was designated as open space. Based upon our agreement, I believed it would have been in the City's best interest to stipulate to such a factual issue and I would have been willing to stipulate to such a fact."

(Information and document obtained by me, through personal correspondence with former residents.)

April 2nd 2005: I contacted Mr. Griffiths re: possible Closed Session sale of Site 653 to Hillel of San Diego. I specifically requested that I be provided notice, etc.

June 7th, 2005: I spoke at public comment after reading a front page article in the San Diego Union Tribune – Site 653 was slated to be sold.

Perceived favoritism, (or blatant favoritism) are hazards of so called Spot Zoning. This project – in all its iterations – has seen not just favoritism, but the most blatant disregard for public process that borders on contempt for public input in decision-making.

### RESPONSE

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.
The project does not propose a single-family residence. The design of the facility of the proposed (Phase 1/Phase 2) project is analyzed in relation to applicable LJSPD ordinance design regulations, including the La Jolla Shores Design Manual to assure its conformance with neighborhood character. As analyzed in EIR Section 4.1.4.1(a) the proposed HCJL under Phase 1/Phase 2 would conform to these concepts of scale, environmental quality, preservation of character, harmony, originality and diversity, color, roof materials, and exterior wall materials. The plan proposes predominately one-story buildings, with the two-story section of the HCJL Center relating to the existing two-story residence directly across La Jolla Scenic Drive. The siting of the three buildings would reduce the scale of the buildings in relation to the established neighborhood character.

The project has been designed to be sensitive with community character. With respect to the elevation of the project site, building areas are away from the corners of La Jolla Village Drive and La Jolla Scenic Way to better address the height differences between the sidewalk and the existing pad elevation of the site. EIR Section 4.12.4.1 includes an analysis of the project building elevations. Specifically, as shown in Figures 3-12A and 3-12B, it is the intent of the design that when the structures are viewed from adjacent streets and houses they would appear as separate structures, thereby reducing the bulk of their appearance. Overall, Phase 1/Phase 2 would not exceed the allowable height or bulk regulations, nor would it exceed the height and bulk of the existing patterns of development in the vicinity. Community landmarks would not be significantly adverse.

Noise and glare (including exterior lighting) are adequately analyzed in EIR Sections 4.8 and 4.12, respectively.

The EIR evaluates the project site as a vacant site that is "designated for low-density residential use, 5-9 dwelling units per acre." See EIR Section 4.1.4.1(a).
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<td>AI-34</td>
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<td>See response to comment AI-7b.</td>
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<td>AI-35</td>
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<td>As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1). The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California. Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project. The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site. To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.</td>
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AI-36

This argument about UCSB, UCLA (a converted YWCA), etc., was refuted in the two previous MNDs, and in testimony to Planning Commission and City Council that the zones and general plan (and underlying community plans) are completely different. I have included my notes from UCSB, and the official Zone report from UCLA planning as Item 7. (Notes taken from the Planning Commission approval documents for the UC Santa Barbara Hillel Facility [once a church].)

Just how distinct the UCLA Hillel facility’s location is can be gleaned from this excerpt: QR4-I-VL – “Multiple Dwelling Zone”

Permitted Uses Include:
- Apartments, boarding houses, churches, child care facilities, hotels, motels, fraternity or sorority houses and dormitories, schools, elementary and high, educational institutions, museums or libraries, retirement hotels, accessory buildings (including private garages, accessory living quarters, guest houses, recreation rooms, or private stables), shelter for the homeless.

Highlights from Item 7: UCSB

Page 7: 2.1 Conditional Use Permit Findings (98-CP-75)

Page 8: 2.1.8 “That the project won’t conflict with any easements required for public access through, or public use of the property.”

2.1.9 “That the proposed use is not inconsistent with the intent of the zone district. The intent of the SR-H zone is to provide high density housing for UCSB students. The proposed Hillel facility would serve participating Jewish UCSB students on a daily basis as desired by the individual, and thus, Hillel’s location in the SR-H zone district and its operation under a conditional use permit is appropriate.”

4.2.20

Where is the analysis of impacts from the present and projected uses of the 2.2 acre UCSD property that lies on the west side of Torrey Pines Road?

The traffic impacts will be addressed in the analysis of document: Traffic Impact Analysis, UCSD Hillel Center for Jewish Life, La Jolla, California. January 11th, 2012.

4.3 Biological Resources

a. Disturbed land 1.28 acres

AI-37

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

AI-38a

The existing vacant lot upon which the project is proposed is a total of 0.80 acre. This is the area included in the biological surveys. The project also includes a ROW vacation which would add an additional 0.49 acre to the project site. Therefore, the total area of disturbed land upon project approval would be 1.29 acres. See EIR Figures 3-1 (size and location of ROW vacation) and 3-3 (final boundaries of the project site).
Al-38b See response to comment AI-29. Aerial photography is not necessarily updated every year, thus the latest available was used to develop the figure.

With respect to the Venter Institute project being included in the cumulative analysis, see response to comment AI-37.

This comment is beyond the scope of the present CEQA document. The Recirculated EIR (December 2013) reflects the currently proposed project.

Al-39a Section 4.3.3.1 of the EIR has been revised to clarify that raptors could utilize both the mature eucalyptus and pine trees located within the project site. Removal of these trees could result in a significant impact because raptor species (which are protected species under the Migratory Bird Treaty Act and other regulations), have the potential to nest in these trees during their breeding season. EIR Section 4.3 adequately details the mitigation measure required to reduce such potentially significant impacts to a less than significant level.

Cumulative biological resources impacts are analyzed in Chapter 7. As previously detailed, the Venter Institute was added to the list of cumulative projects taken into account within this analysis.

Al-39b See response to comment AI-39a. Permits are not required for tree removal on personal property within the ROW.
The site of the Venter Institute was added to the list of cumulative projects in the Recirculated EIR (December 2013). As discussed in Section 7.3 of the EIR, the project would not result in cumulative impacts to raptors and nesting birds because all direct impacts would be reduced to less than significant through individual project mitigation so no cumulative impacts would occur.

AI-40a Please refer to EIR Section 4.8.3.1(a) for the construction noise analysis conducted for the Phase 1/Phase 2 project. As stated therein, pursuant to the City’s Noise Ordinance, temporary construction noise that exceeds 75 dB(A) Leq at a sensitive receptor would be considered significant.

For a worst-case analysis, it was assumed that all the equipment listed in Table 4.8-3 of the EIR would operate simultaneously. As shown, the worst-case average hourly noise level at 100 feet would be 73.8 dB(A) Leq(1). Grading would occur over the entire site and would not be situated at any one location for a long period. Therefore, the acoustic center of the construction activity was assumed to be the center of the vacant site. Neighboring uses are more than 100 feet from the center of the vacant site. Therefore, construction noise levels at the neighboring residences are projected to be within City standards and impacts would be less than significant.

As previously detailed, the Venter Institute was added to the cumulative projects considered within the analysis of Chapter 7. Cumulative noise impacts were determined to be less than significant for the reasons detailed therein. Further, the Venter Institute has finished construction.

It is unclear what EIR addendum is being referenced in this comment. The project is consistent with existing LJSPDO and Design Manual. The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating
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<td>to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.</td>
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<td>With respect to construction noise, see response to comment AI-40a.</td>
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The Recirculated EIR (December 2013) clarified this information. As detailed in Section 4.12.1.2:

A single-family home (attached, multiple units) development, built in the mid-1970s, lies across La Jolla Scenic Way to the east. West of the project site, across Torrey Pines Road, lies vacant land that is planned and permitted for institutional uses (owned by UCSD).

As previously detailed, the Venter Institute had not begun construction when the NOP was issued for the EIR (2010). However, the Recirculated EIR (December 2013) added the Venter Institute to the cumulative project analysis contained within Chapter 7 of the EIR.

The UCSD theaters are approximately 350 feet north of the project site, as accurately summarized in the EIR.

The elevation of the slope referenced by the commenter is approximately 10 feet, as accurately summarized in the EIR. The remainder of this comment is based on the commenter’s opinion and no further response is required.

The EIR section referenced by the commenter is excerpted below:

The House
This section of the Design Manual does not provide specific guidance for non-residential use. However, the section contains guidelines for higher-density residential buildings, such as apartments, in order to better blend in within a single-family residential zone. Thus, this portion of the guidelines is outlined below, as they would be applicable to Phase 1/Phase 2.

As detailed therein, the Design Manual provides no guidance for buildings that are for non-residential use, such as the Phase 1/Phase 2 project. Therefore, this section of the Design Manual was the most applicable to the Phase 1/Phase 2 project for the reasons detailed above. The Phase 1/Phase 2 project would not contain apartments or any residential component. This section of the Design Manual was
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<td>AI-42 (cont.) used for the analysis because it contains guidance for buildings to &quot;better blend in within a single-family residential zone.&quot; As detailed in EIR Section 4.12.4.1(a), the Phase 1/Phase 2 project would have a less than significant impact in relation to the Neighborhood Character threshold.</td>
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<td>AI-43</td>
<td>This comment does not raise an issue related to any substantive issues or to the adequacy and/or accuracy of the EIR. No further response is required.</td>
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<tr>
<td>AI-44</td>
<td>The La Jolla Playhouse was included in Figure 4.12-3 as it is a figure that shows surrounding land uses. The remainder of this comment does not raise an issue associated with the adequacy or accuracy of the EIR and, therefore, no further response is required.</td>
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AI-45 The No Project Alternative which would maintain the site in its current undeveloped state is analyzed in Chapter 9.

AI-46a See response to comment AI-5c.

This comment does not raise any substantive issue associated with the adequacy or accuracy of the EIR. No further response is required.
In addition to my earlier comments about this site I have added a map (not included in the DEIR) and a print out of a graphic that would have been useful to respondents to this DEIR who have had to have to "guess" from the DEIR where the site is. (Item 15) Site 675 is close to the pedestrian bridge, the transit areas and served by several nearby parking lots. As the third document shows, the site is surrounded by UCSD. (An error on the City map records the location as that of 653.)

AI-47

The Recirculated EIR (December 2013) includes a figure that shows the location of Site 675.
LETTER

AI-48a

Background to my comments on the above report.
Item 16 of the Appendix is a copy of the Fehr and Peers Transportation Consultants’ report on the Venter Access Site Access Study, as prepared for UCSD.

I have included this item because it indicates quite clearly that the City, and possibly Hillel of San Diego as the applicants, has failed to disclose known traffic impacts in the vicinity of the project site.

In a letter dated May 9th, 2007, therefore predicting the MND 149437 (which also did not include the impacts of the development of parcels 1-4 on the vacant parcel to the west of Torrey Pines Road), the following are stated:

1. “The analysis and recommendations presented in this report reflect opinions of City of San Diego Development Services Department transportation staff. In a meeting on September 25th, 2006 …”

2. “In addition, the City commented on the amount of on-street parking to be removed to provide adequate distance for egress vehicles.” The cumulative impact of the known loss of on-street parking just a hundred feet distant, more or less, in addition to that to be removed for Project 212995 is not discussed in the traffic and parking impacts section.

3. There is no specific analysis in the DEIR of the “… approximately 60 AM peak hour, 50PM peak hour, and 360 daily trips estimated to be generated by the Venter Institute alone.

4. My comments: The impact of additional traffic at Glenbrook Way is not cumulatively analyzed in the DEIR. Neither is the impact of commuter traffic that potentially will rush onto Cliffridge Avenue to “flow” where the STOP currently is placed, and leave the neighborhood via La Scenic Way, or La Jolla Scenic Drive North.

As a general comment: The development of Parcel 4 – already well under way – and the future, planned development of an additional 50,000 square feet of laboratory/office space, etc., will have an impact on the pedestrian crossings at LJ Village Drive from UCSD to parcels 1-4, and from the site to UCSD. None of the impacts on pedestrian signals due to increased pedestrian foot traffic between the sites by staff and students who will work collaboratively in these partnerships have been projected in the DEIR.

RESPONSE

AI-48a

The City of San Diego’s comments on the Venter Site Access Study from 2007 are beyond the scope of the analysis within the Traffic Impact Analysis for the Phase 1/Phase 2 project. However, the Venter Institute project was added to the cumulative projects analysis within the Recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7. See also response to comment AI-37.

The vehicle access scenarios set forth by the commenter are speculative. The Venter Institute’s traffic impacts were accurately analyzed in the IS/MND for that project, which were in turn accounted for in the Recirculated EIR.

With regards to access to and from the Venter Institute, EIR Section 4.2.3.1 (a) states:

The Venter Institute has revised the site plan to only provide access to Expedition Way (full access driveway). Access to Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project is approved, and is currently under construction. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2(a), specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

With regards to Glenbrook Way, the Phase 1/Phase 2 project would generate a total of eight peak hour trips. The City of San Diego does not require an analysis of roadways to which a project is forecasted to add less than 50 peak hour trips. Since the project will add much less than this amount to Glenbrook Way, an analysis of this roadway is not warranted.
AI-48a (cont.)

There was no other known planned development amongst other UCSD-owned parcels adjacent to the Venter Institute when the EIR was released. However, the traffic volumes from the potential buildout of the UCSD campus (including vacant parcels) are included in the cumulative traffic volumes used in the project’s Traffic Impact Analysis. Therefore, although other potential impacts of the vacant sites are not known, the traffic volumes were accurately captured within the Traffic Impact Analysis prepared as part of the EIR.
AI-49a With respect to the safety of the project driveway, a project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

AI-49b As detailed throughout EIR Section 4.2, traffic-related impacts would be less than significant.

AI-49c See response to comment AI-32b.

AI-49d See response to comment AI-49a.

AI-50 The cumulative projects list was updated as part of the Recirculated EIR (December 2013) and associated appendices, including the Traffic Impact Analysis. The list of all relevant foreseeable projects can be found in EIR Section 4.3.2.1.

AI-51 With respect to the number of parking spaces to be provided, see response to comment AI-7b.
AI-52
See response to comment AI-35.

AI-53
With respect to the narrowing of La Jolla Scenic Drive North, the proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

Additionally, the traffic study shows that only 1 percent (2 trips per day) would be added to La Jolla Scenic Drive North by the project. Therefore, no significant impact would result.

AI-54
See responses to comments AI-27 and AI-53.
LETTER RESPONSE

LETTER

This Letter Agreement ("Agreement") is made and entered into this [date to be filled in by UCSD Real Estate Development after both parties have signed] day of July, 2003, by and between THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, a California corporation, ("Licensor"); on behalf of the San Diego Campus ("UCSD") and MILEL OF SAN DIEGO, a California non-profit corporation ("Licensee").

WHEREAS, Licensor is the owner of real property consisting of various parking lot facilities located at UCSD, one of the campus areas of UCSD.

WHEREAS, Licensee is proceeding with the development of a permanent Hotel Center ("Hotel Center") to serve the Jewish students at UCSD. To be located adjacent to UCSD on La Jolla Village Drive, and in connection with its development and use of the Hotel Center, licensees have negotiated a lease agreement for itself, its guests, and employees to use parking facilities as parking to support the ("Licensees").

WHEREAS, Licensee desires to grant such permission under the terms and conditions as are set forth below.

NOW, THEREFORE, the parties agree as follows:

1. Licensee hereby grants to Licensee, its agents and licensees, a non-exclusive license to enter upon and use the Premises and the right of ingress and egress to and from the Premises for purposes of parking a maximum of seventy (70) passenger vehicles owned by Licensee, its agents and Licensees for School Services and a maximum of twenty (20) passenger vehicles owned by Licensee, its agents and Licensees for School Services and for flights services between the Premises and the Hotel Center ("Licensee"). The hours of use permitted in this letter shall be from 5 a.m. to 11:00 p.m. or to the satisfaction of School Services. The hours of use for School Events shall be subject to the prior designation and approved by Licensee for each specific event and may vary at the discretion of Licensee, in accordance with the procedures set forth herein. However, the use of the Premises will be subject to additional occupancy for Special Events occurring before 6 p.m. during UCSD’s normal academic or work week.

Promises

1. The parking facility to be used as the Premises shall be designated by Licensee from time to time during the term of the Agreement in the exercise of Licensee’s reasonable discretion, with the intent that Licensee shall reasonably designate the parking lot in closest proximity to the Hotel Center that is anticipated to have the available parking availability during the date and time of the Licensed use. Licensee has requested the use of one of the following Lots New or Lots for School Services. The location of these Lots is depicted on Exhibit A attached hereto and incorporated herein by reference. Licensee and Licensor acknowledge that these facilities currently have adequate parking availability to meet Licensees need for School Services; however, availability may change from time to time and another location for the designated Premises may be more appropriate. Licensor hereby designates the above referenced Lots for School Services.
LETTER

The designation of the Premises for Special Events shall be made by Licensee based upon availability of parking at the proposed location and at the particular date and time as reasonably determined by Licensee with the input that Licensee shall reasonably determine a parking lot in distance proximity to the halls which is reasonably feasible. Licensee shall provide not less than 120 days notice to Licensor of the date and time of Licensee’s Special Event and Licensor and Licensee shall confer on the circumstances designated Premises for Licensor’s use for each Special Event. Licensor shall notify Licensor of the designated Premises for the Special Event at least 30 days prior to the date of the Special Event. Please note that Licensor has given the written notice to Licensor as stated herein.

RESPONSE

Licensor shall pay to Licensor a fee for each parking space on the Premises used by Licensee in accordance with the terms of this Agreement. The fee shall be paid on a monthly basis. If the Parking Options are amended or modified, the fees shall be adjusted accordingly. All payments shall be made within 10 days after the completion of the Licensor use and shall be submitted to the Treasurer of the University of California and remitted to:

Director, Operations
Transportation & Parking Services, W040
University of California, San Diego
9500 Gilman Drive
La Jolla, CA 92093-0040

5. Certificate of License. Licensee shall submit to the University a certificate of insurance, which is to be signed by the University and any other parties as required by the University, with respect to the Premises, whether or not of record.

6. Licensee Responsibilities

Licenses may accept the Premises on an “as is” condition basis and acknowledges that no further improvements will be made by Licensee.

Licenses shall not use to private parking on the Premises or during those times that have been specifically designated by Licensee for event guests. Indemnity for damages. Licenses shall not collect any money on the Premises for parking.
C. 

D. 

E. 

F. 

G. 

H. 

I. 

J. 

K. 

L. 

M. 

N. 

O. 

P. 

Q. 

R. 

S. 

T. 

U. 

V. 

W. 

X. 

Y. 

Z. 

**RTC-310**
TRANSFER TAX - NEW DEDUCTION
CITY OF SAN DIEGO

GRANT DEED

For a valuable consideration, receipt of which is hereby acknowledged,

THE CITY OF SAN DIEGO, a California municipal corporation, in the County of San Diego, State of California hereby GRANT(S) TO

HILLEL OF SAN DIEGO, a California nonprofit corporation, in the County of San Diego, State of California all that real property situated in the City of San Diego, County of San Diego, State of California, more particularly described as follows:

That portion of Pueblo Lot 1299 of Pueblo Lands of San Diego, according to Map thereof made by James Peacock in 1879, a copy of said Map was filed in the office of the County Recorder of said County of San Diego November 14, 1921 as is known as Miscellaneous Map No. 36, being more particularly described in the attached EXHIBIT "A" entitled LAND SALE.

IN WITNESS WHEREOF, the City of San Diego has caused this deed to be executed by its City Mayor, pursuant to resolution R-301436 of the Council authorizing such execution, this 9th day of May, 2006.

THE CITY OF SAN DIEGO
ACKNOWLEDGMENT

State of California
County of SAN DIEGO

On 12/18/100 before me, DAVID CHARLES MARTENS, NOTARY PUBLIC
(Here insert name and title of the officer)

personally appeared JAMES P. BARLOCH

Personally known to me (or proved to me on the basis of satisfactory evidence) to be
the person(s) whose name(s) are subscribed to the within instrument and
acknowledged to me that they executed the same in their authorized
capacity(ies), and that by their signature(s) on the instrument the person(s),
or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature

(Seal)
EXHIBIT "A"
LAND SALE

THAT PORTION OF PUEBLO LOT 1298 OF THE PUEBLO LANDS OF SAN DIEGO, IN THE CITY OF SAN DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, ACCORDING TO MAP THEREOF MADE BY JAMES PASCOE IN 1876, A COPY OF WHICH SAID MAP WAS FILED IN THE OFFICE OF COUNTY RECORDER OF SAN DIEGO COUNTY, NOVEMBER 14, 1921 AS MISCELLANEOUS MAP NO. 36, BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT ON THE NORTHERLY RIGHT OF WAY LINE OF LA JOLLA SCENIC DRIVE NORTH, DEDICATED FOR STREET PURPOSES BY RESOLUTION 16975, RECORDED OCTOBER 3, 1938 DOCUMENT NO. 163460 OF OFFICIAL RECORDS, ALSO BEING A POINT ON THE SOUTHERLY RIGHT OF WAY OF LA JOLLA VILLAGE DRIVE (FORMALLY MIRAMAR ROAD) AS DEDICATED FOR STREET PURPOSES BY RESOLUTION NO. 166827 RECORDED APRIL 5, 1960 DOCUMENT NO. 35775 OF OFFICIAL RECORDS; THENCE SOUTHEAST ALONG SAID NORTHERLY RIGHT OF WAY SOUTH 62° 33' 14" EAST 24.94 FEET TO THE TRUE POINT OF BEGINNING, SAID POINT ALSO BEING THE BEGINNING OF AN NON TANGENT 634.64 FOOT RADIUS CURVE, CONCAVE NORTHERLY, A RADIAL TO SAID POINT BEARS SOUTH 02° 29' 59" EAST, AND ALSO CONCENTRIC WITH AND 12.00 FEET SOUTHEASTLY OF THE SOUTHERLY RIGHT OF SAID WAY OF LA JOLLA VILLAGE DRIVE; THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 14° 09' 09", AN ARC DISTANCE OF 153.09 FEET TO THE BEGINNING OF A TANGENT REVERSE CURVE CONCAVE SOUTHWESTERLY HAVING A RADIUS OF 20.00 FEET, A RADIAL TO SAID BEGINNING OF REVERSE CURVE BEARS NORTH 16° 21' 06" WEST; THENCE EASTERLY AND SOUTHERLY ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 84° 23' 14" AN ARC DISTANCE OF 29.46 FEET TO THE WESTERLY RIGHT OF WAY OF LA JOLLA SCENIC WAY AS DEDICATED FOR STREET PURPOSES BY RESOLUTION NO. 166827 RECORDED APRIL 5, 1960 DOCUMENT NO. 56775 OF OFFICIAL RECORDS; THENCE ALONG SAID RIGHT OF WAY SOUTH 21° 17' 52" EAST, 373.49 FEET TO THE BEGINNING OF A TANGENT 2000 RADIUS CURVE, CONCAVE NORTHWESTERLY; THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 140° 01' 34", AN ARC DISTANCE OF 52.02 FEET TO THE BEGINNING OF A REVERSE CURVE, CONCAVE SOUTHWESTERLY, HAVING A RADIUS OF 653.00 FEET, A
THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 88°52'48", AN ARC DISTANCE OF 127.06 FEET; THENCE NON-TANGENT TO SAID CURVE NORTH 58°37'31" WEST, 72.74 FEET; THENCE SOUTH 58°48'35" WEST, 13.12 FEET; THENCE NORTH 62°33'56" WEST, 10.84 FEET TO THE BEGINNING OF A TANGENT 20.00 FOOT RADIUS CURVE, CONCAVE SOUTHEAST; THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 86°06'17"4", AN ARC DISTANCE OF 57.10 FEET TO A POINT OF CURVE, THENCE NORTH 11°36'32" EAST, 34.46 FEET TO THE BEGINNING OF A TANGENT 20.00 FOOT RADIUS CURVE, CONCAVE SOUTHEASTERLY; THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 83°18'50", AN ARC DISTANCE OF 52.38 FEET TO THE BEGINNING OF A REVERSE 636.64 FOOT RADIUS CURVE, CONCAVE NORTHERLY, A RADIAL TO SAID POINT BEARS SOUTH 14°20'22" WEST; THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 99°12'17", AN ARC DISTANCE OF 102.28 FEET TO THE BEGINNING OF A COMPOUND 42.00 FOOT RADIUS CURVE CONCAVE NORTHERLY, A RADIAL TO SAID POINT BEARS SOUTH 09°14'05" WEST; THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 04°43'20", AN ARC DISTANCE OF 3.45 FEET; THENCE SOUTH 89°27'37" EAST, 48.73 FEET TO THE BEGINNING OF A TANGENT 43.64 FOOT RADIUS CURVE, CONCAVE NORTHERLY; THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 02°33'02", AN ARC DISTANCE OF 31.94 FEET TO THE TRUE POINT OF BEGINNING.

AREA: 33,567 SQ. FT. 0.771 ACRES MORE OR LESS
June 15, 2003

NOTICE OF VIOLATION

Location: 8976 Cliffridge Avenue
Assessor's Parcel No.: 344-131-01

Owner: Robert Marshall
Address: 8976 Cliffridge Avenue
La Jolla, CA 92037

Tenant: Hotel of San Diego
via Neal L. Singer
Address: 8976 Cliffridge Avenue
La Jolla, CA 92037

Zone: L-1-5

A representative of the Neighborhood Code Compliance Department conducted an inspection of the above referenced premises on May 14, 2003. In accordance with State and City Housing Laws, or San Diego Municipal Code (SDMC) this is to notify you that the following violation(s) were observed and must be corrected by July 18, 2003.

The specific code sections in violation include, but may not be limited to, the following:

2001 Edition CBC Section 3403 No change shall be made in the character of occupancies or use of any building which would place the building in a different division of the same group of occupancy or in a different group of occupancies, unless such building is made to comply with the requirements of this code for such division or group of occupancy.

You are required to either obtain the required building permit for the office/estyle use OR the approved residence must be restored to its approved dwelling unit use and occupied as a dwelling unit.

PLEASE TAKE THIS NOTICE WITH YOU WHEN APPLYING FOR PERMITS.

Engineering and building permits may be applied for at the Development Services Department, 1222 Fifth Avenue, third floor. Please telephone (619) 446-6000 for general information about getting the required permits.

Neighborhood Code Compliance
1222 Fifth Avenue, San Diego, CA 92101-1014
Tel: 1-619-235-8760 Fax: 1-619-235-8761

RTC-318
LETTER

July 2013 — From Hillel of San Diego, Jewish Campus Centers, 5742 Montecito Road, San Diego, CA 92115

Campus Comments
A publication of Hillel of San Diego
San Diego State University • University of California, San Diego
San Diego Community Colleges • Local Universi

[HEILLE AT UCSD HAS A TEMPORARY HOME]
In an extraordinary gift of generosity and creativity, the Potiker Family Foundation has purchased a house across the street from UCSD and offered Hillel of San Diego the use of the house as an interior facility. The house, situated at the corner of La Jolla Village Drive and Torrey Pines Road, provides a kosher kitchen, a cozy living room complete with a fireplace, a conference room in the garage and office space for the Hillel staff.

“We are so grateful to the Potikers!” said Executive Director Rabbi Lisa Coldstein. This gift makes a profound difference. For the first time we are able to offer students an actual place, a Hillel house where they feel welcomed.

Hughes and Sheila Potiker are the establishments of the Potiker Family Foundation. Their son and daughter-in-law, Lowell and Julie Potiker, say how Hillel could benefit from the use of the house and oversee renovations of the house. “We are fortunate that we are able to help,” said Sheila Potiker. “It is a mitzvah.”

In the meantime, the Facilities Committee of Hillel of San Diego, headed by Neil Seltzer for the past several years, is still hard at work pursuing the acquisition of a city-owned parcel for a permanent home for Hillel at UCSD. We hope to come before the City Council for a final hearing in the fall.

Rabbi Lisa Coldstein, Outgoing Presidnet Rick Lapidus, Lowell Potiker, and Sheila Potiker at Hillel’s Annual Meeting

RESPONSE

RTC-319
February 27, 2004

City of San Diego
Development Services
1222 First Avenue, MS-301
San Diego, CA 92101-4154
Attention: Robert Kurch, Project Manager

Re: Merger of Applications for 8976 Clifford Avenue, La Jolla (Site Development Permit) Project No. 20140 (“House” or “8976 Clifford”) and for Site 653, La Jolla, CA (Street Vacation, Planned Development Permit, La Jolla Shores Development Permit, Easement Abandonment) Project No. 6928 (“Site 653 Project” or “Hillel Center”)

Dear Bob:

Request to Merge Applications:

In accordance with our meeting with you and Development Services Planning Staff on February 11, 2004, and in order to facilitate a coordinated staff review of the above referenced projects, as well as contemplated phasing of these projects, we hereby request that the applications for the House Project and the Site 653 Project be merged.

At the development team and DS staff review meeting on February 11, 2004, we addressed staff’s questions with respect to offsite parking for the House Project, the new property line between the House and Site 653 upon abandonment of the right of way, realignment of the access drive to 8976 Clifford upon abandonment of the cul-de-sac, and consideration of cumulative impacts with respect to both projects. We also discussed our proposed alternate parking plans and City requirements with respect to offsite parking arrangements. Scott Barker and Jennifer Ayala have had follow up meetings with Ali Sabouri and have presented to Ali an additional 89% Clifford parking alternative and have received further clarification on the shared parking regulations.

House Project Parking Alternatives:

This letter will also confirm and clarify our parking proposals for the House Project. Based upon our meeting and subsequent discussions, we are now presenting 2 different
parking alternatives for the House Project. These alternatives are presented in Hillel's order of preference, as follows:

Alternative 1: Provide 6 parking spaces in the abandoned cul-de-sac. This alternative is depicted on Sheet A2.1, and involves the construction of a temporary sidewalk and parking improvements with the abandoned cul-de-sac right of way, if the abandonment is approved as part of the Site 653 Project. This alternative assumes that Hillel's application for the Site 653 Site Development Permit and application for abandonment of right of way cul-de-sac will be approved. As Hillel will be occupying the House and will own or lease Site 653 (the Site 653 Project and the transaction to sell or lease will be brought to the Council for approval at the same time), we could satisfy the offsite parking regulations by entering into a "shared parking agreement" with ourselves. This alternative assumes the phasing of the project as described below, see "Phasing of Project." At such time as Hillel moves out of the House after completion of the Hillel Center, we would relinquish the permit for occupying the House, remove the cul-de-sac parking area and install the permanent landscaping improvements as per the Site 653 Project application plans. We would propose a "condition" to our House Permit that would require us to relinquish the permit for the House Project upon the issuance of a certificate of occupancy for the Hillel Center. This condition will also support our commitment to the neighborhood that we do not intend to remain in the House after completion of the Hillel Center.

If the Site 653 Project is approved but this alternative to provide temporary parking in the cul-de-sac is not approved, then we would likely amend our application to request a variance to the parking regulations for this temporary period. We are not requesting a variance at this time, although we believe this would be the most desirable option to address the short-term parking requirements for the House for both Hillel and the community. We would respectfully preserve the right to amend our application in the future so as to avoid having to proceed with Alternative 2 below for only a temporary period.

Alternative 2: This alternative provides for satisfying the parking requirements on site. This alternative provides for demolition of the existing garage at the House and construction of 6 parking spaces on site at 8976 Clifton as depicted on Sheet A2.1, submitted herewith. We would propose that this alternative be required only if the Site 653 application and corresponding right of way abandonment is denied.

Support by House Owner:

We have confirmed with the owner of the House that they will provide their consent to the street vacation and abandonment and the plans for reconfiguration of the driveway, or if necessary under alternative 2 above, demolition of the garage and construction of the on-site parking as per plans attached. We will work with staff to satisfy this requirement by appropriate written agreement.
Phasing of Project:

Based upon the above request, and assuming that both the 8976 Cliffsedge and the Hilltop Center projects (with abandonment of right of way) are approved, we contemplate a three-phased project. Phase 1 will be construction of the driveway and parking improvements in the cul-de-sac of the abandoned right of way, including curb and sidewalk. Phase 2 will include construction of the Hilltop Center as per plan, excluding the permanent improvements to be constructed in the abandoned cul-de-sac. After obtaining a certificate of occupancy for the Hilltop Center, we will vacate the House and finish the site improvements to the abandoned cul-de-sac as shown in the Site 683 Project application.

If you require any additional information concerning this application, please feel free to contact me at 619-338-4932.

Sincerely,

Robert Lapidus
Immediate Past President
Chair Facilities Committee
Hilltop of San Diego
January 27, 1999

TELECOPY

Ms. Lucille Goodman
Asset Management Supervisor
Real Estate Assets Dept.
1200 Third Ave., Ste. 1700
San Diego, CA 92101

Dear Ms. Goodman:

This confirms our meeting in your office at 3:00 p.m. on February 8th. Joining me will be Mr. Neal Singer, my fellow board member of Hillel of San Diego.

Hillel is an international organization providing services, programs and facilities to Jewish college students on more than 200 campuses.

We have a Hillel House close to San Diego State University for use by students on that campus. We are very desirous of also providing physical facilities for UCSD students to enhance and facilitate programs for their benefit.

We have identified a vacant property south of the Mandell Weiss Theater owned by the City, designated as Parcel 26 on San Diego County Assessor's Map, Book 344, Page 12. It appears to be a leftover triangular parcel remaining from the installation of the three roadways which surround it: La Jolla Village Drive, La Jolla Scenic Way and La Jolla Scenic Drive North. We believe the parcel is actually larger than that reflected on the parcel map. An inspection reveals that a portion of the adjacent La Jolla Village Drive right-of-way is beyond the boundary of the road and forms part of the vacant triangular property that interests us.

Hillel is interested in acquiring the property for the purpose of constructing upon it a Hillel House for use by UCSD students. We would prefer to purchase it from the City, but a long-term lease would be considered.
Ms. Lucille Goodman
January 27, 1999
Page 2

Mr. Singer and I look forward to meeting with you on February 8th.

Sincerely,

[Signature]
Herbert J. Solomon

cc: Mr. John Barlow, Council Representative
    Mr. Neal Singer

P.M.R/002/001.002/5.03
MEMORANDUM

DATE:       June 10, 1999
TO:         William T. Grifflh, Real Estate Assets Director
FROM:       Councilmember Harry Mathis
SUBJECT:    City Owned Lot at Southeast corner of N. Torrey Pines Rd., Torrey Pines Rd., and La Jolla Village Dr.

I would like to request that Real Estates Assets staff work with Planning and Development Review staff and the community to ascertain if this lot could be leased or sold to a private organization for use as a student center.

cc: Michael Urbanaga
    HDG

[Signature]
CITY OF SAN DIEGO
MEMORANDUM

DATE: July 16, 1990
TO: Councilmember Harry Shivers
FROM: William T. Griffith, Real Estate Assets Director
SUBJECT: AIM #90-0444 Response - City Parcel at La Jolla Scenic Drive

Real Estate Assets staff has been advised that a student center use is consistent with the prevailing zoning of the City parcel, which is Single Family Housing. Additionally, the Transportation Division has informed us that the future road work on La Jolla Village Drive will not materially impact the City parcel. However, there may be some minor curb, gutter, and sidewalk improvements necessary along La Jolla Scenic Drive or La Jolla Village Drive. Staff is contacting the Community Planning Group and will have its comments forwarded to you by July 23. We are committed to working with the community and Planning and Development Review staff to ascertain if this parcel can be developed.

For further questions on this matter, please contact Ludlie Goodman, Asset Marketing Supervisor at Ext. 66720.

WILLIAM T. GRIFFITH
jmj
IMPOUNDS/GOODMAN/SHIVERS
From: William McKay
To: Alhakim Shahriar, Hassein Salem
Date: 3/15/09 9:29 AM
Subject: Re: Another Question

Shahriar, the property is located in the SF zone of the La Jolla Planned District. The SF zone allows
by right, schools limited to primary, elementary, junior and senior high schools (03.0354.1.4). A
 Chaplin center would be permitted by right only if it were an accessory use to one of the schools permitted
by right. The student center you describe would require a Conditional Use Permit approved by the
Planning Commission (Provision 4). The student center you describe would likely qualify for one of the types
of CUP, but we'd have to know more about the activity to determine which type. Both types are Process-
4. Let me know if you need additional info.

Shahriar Alhakim 03/14 8:15 PM
Since you're going to develop, I have another basic question on zoning. The City owns a
13,000 sq ft triangular lot at La Jolla Village Drive, La Jolla Scenic Drive, and N. Torrey Pines. The APN
is 544-120-36.

I believe that it is zoned as R2-3000. The question is if a "student center" is allowable under the existing
zone, which does allow schools? A previous planner said yes. What do you think?

I do not know too much else about the proposed student center other than it is a private nonprofit
organization that is currently on the UCSD campus and is moving off-campus. They plan to provide
social, cultural, etc., support to an ethnic community.

Thanks,
Shahriar Alhakim
510-228-0228
March 24, 2000

Councilmember Christine Kehoe
Land Use and Housing Committee
City of San Diego
202 4th Street
San Diego, CA 92101

Re: Land Use and Housing Committee Meeting of April 12, 2000

Dear Susan,

Hillel of San Diego (“Hillel”), the organization that provides services, programs, and facilities to local Jewish college students, has been granted the privilege of addressing the members of the Land Use and Housing Committee at its meeting scheduled for April 12, 2000. At that meeting, Hillel will express its reservations regarding a longstanding interest in a City-owned parcel of land, located close to the USCD campus, for purposes of establishing a permanent facility for the Hillel members on campus. This triangular shaped parcel is located directly across the street from the Mandell Weiss Theatre and is bordered by La Jolla Village Drive, Torrey Pines Road, and La Jolla Scenic Drive North. The property has sat vacant since before the surrounding roads were installed in the early 1960s.

Hillel, a beneficiary agency of the United Jewish Federation of San Diego and an accredited affiliate of the Hillel international organization that has a presence on over 200 campuses, made an initial inquiry about this remnant City-owned parcel with the City of San Diego Property Department in 1997. Hillel has been engaged with the property department since that time in an effort to secure the subject property for its intended use.

On behalf of Hillel, I respectfully request a meeting with you in advance of the April 12 meeting so that we may present our interest in obtaining exclusive negotiating rights to acquire this property. I will telephone you next week to schedule a meeting at a time that will be convenient for you. Thank you for your consideration.

Sincerely,

[Signature]

President

Hillel of San Diego

RTC-329
LETTER

April 12, 2000

Michael T. Ubaruga
City Manager
City of San Diego
202 C Street
San Diego, CA 92101

RE: .32 Acre Property at La Jolla Village Drive and Cliffridge

Dear Mr. Ubaruga,

On behalf of the Diocese of San Diego and the Catholic Community at USD, please consider our interest in purchasing the above referenced parcel. Our campus ministry is presently being vacated from the Lutheran Center on La Jolla Kheves and Torrey Pines Rd. We are in dire need of a site within walking distance from the campus. The City owned parcel at the end of Cliffridge Ave., when combined with 13,000 sf of vacated right-of-way, may suit us well.

As the leadership of the City considers the future of this property, please keep us in mind.

Sincerely,

[Signature]

Wm. Joey King, AIA
Construction Services

cc: Mgr. Steve Callahan, Chancellor
Fr. Cassian Lewinski

RTC-330

RESPONSE
MEMORANDUM

To: Will Griffith
     Leslie Goodman
     Shahar Afshar

From: Neal L. Singer – Hillel of San Diego

Date: April 26, 2000

Re: City Owned Parcel No. 633, APN 344-129-26

In anticipation of the RFP for the above referenced site being released, Hillel of San Diego had MarketPoint Realty Advisors (formerly MarketPro), a San Diego based real

estate consulting firm, prepare an estimate of value for the city owned parcel.

Market Point Realty Advisors ("MarketPoint") used as the basis of its valuation conclusions the 1999 sales of 3 contiguous, rectangular shaped, single-family lots

located on Kilbourne Drive in La Jolla, approximately 1/8 mile from the subject

property. The highest price paid for one of these lots equated to a price per square foot of

$214.81, with an average price over the three lots computed at $232.06.

As these three lots are located on a quiet cul-de-sac, MarketPoint adjusted the value

generated from these comparable properties downward to account for street noise around

the subject property and the subject property's triangular configuration. MarketPoint

concluded that the city owned property had an adjusted value of $175.35 per square foot.

I wanted to share this information with you prior to any minimum bid being established for

purposes of the RFP. I will be available to discuss this information further with you, if

you so desire. If you wish to contact me, please don’t hesitate to call me at 619-232-5169.

Sincerely,

[Signatures]

[Handwritten notes]

Preparation of Contract, MarketPoint

[Handwritten notes]

[Handwritten notes]

[Handwritten notes]
April 27, 2000

Mr. Joel King, AIA
P.O. Box 88728
San Diego, CA 92186-3728

Reference: City Purchase at La Jolla Village Drive and Cliffside

Dear Mr. King:

Your letter of April 11, 2000 has been forwarded to this office for a response. As you may know, the City is in the process of distributing a Request for Proposal (RFP) for the lease or sale of the above noted parcel. As soon as we are prepared to publish the RFP, we will forward a copy to your attention.

Please contact the City of San Diego at 619-236-7028 with any further inquiries.

Sincerely,

[Signature]

Julie E. Verdun
Asset Marketing Supervisor
LMS/SA/10000

The City of San Diego

Real Estate Assets
1101 Teleport Ave., San Diego, CA 92154-1311

RTC-332
TBNC

TJN

May 8, 2009

Shakhar Albor
City of San Diego
City of San Diego
Real Estate Department
1215 5th Avenue, Suite 1700
San Diego, California 92101


Re: RFP SW Corner La Jolla Scenic Way and La Jolla Village Drive

Dear Sir,

We are interested in reviewing the opportunity presented in your Public Legal Notice of May 19, 2009.

Thank you for your consideration.

Yours sincerely,

Tom Eggermont
City of San Diego, California
LETTER

PAX TRANSMITTAL

TO: City of San Diego
    Real Estate Dept.

REQUEST: Payment of $258.00
Date of Escrow:

Sincerely,

[Handwritten Signature]

Instructions:

Please send a CFP package

To:

The Council

of Museums Associates

Fax # 219-298-0238

Mail to:

2355 Munnings Way

San Diego, CA 92105

Number of pages including cover page:

1

RTC-334
DATE ISSUED:  
ATTENTION: Land Use & Housing Committee  
Agenda of July 19, 2000  
SUBJECT: Request for Proposal (RFP) Selection for Site 653 in La Jolla  

SUMMARY  
Issue: Should the City Manager enter into exclusive negotiations for the ground lease of Site 653 at La Jolla Scenic Drive North with Hillel of San Diego?  
Manager's Recommendation - Authorize exclusive negotiations with Hillel of San Diego.  
Other Recommendations - An ad hoc committee that reviewed the two RFP responses has also recommended that the City enter into exclusive negotiations with Hillel of San Diego.  
Fiscal Impact - None with this action. Upon execution of a lease with Hillel, the City will receive $33,000 to $45,000 a year, depending on approval of a street vacation action. Funds would be deposited into the Public Lot Parking Decentralization Fund #310481.  

BACKGROUND  
Site 653 is a vacant triangular parcel located at La Jolla Village Drive, La Jolla Scenic Drive North, and La Jolla Scenic Way, South of the University of California at San Diego campus. The site is approximately 12,541 square feet and may encompass a larger area of an additional 17,923 square feet if a partial stair street is vacated at La Jolla Scenic Drive North, for a total of 33,464 square feet.  
On April 12, 2000, this Committee authorized Real Estate Assets Department staff to go out with an RFP for the potential sale or lease of the site with a higher priority given to student organization based at UCSD.  

DISCUSSION  
Staff advertised the RFP and received two responses by the June 5th deadline. The two responses were from Hillel of San Diego to develop and operate a facility serving the UCSD Jewish student community and the La Jolla Highlands Homeowners to maintain an undeveloped landscaped area. A four-member ad hoc committee made up of two City staff and two members of the La Jolla community voted three to one in favor of entering into negotiations with Hillel of San Diego. The ad hoc committee recommended that the City consider the current and proposed land use designations of the site in its decision to move into ground lease negotiations.
The current 1975 La Jolla Community Plan does not indicate the site as open space/park on the Open Space map, nor does it include the site in the La Jolla Parks list. The 1976 La Jolla Community Plan map shows the lot within the single family residential boundary. The Draft 1995 Community Plan indicates the subject lot as Designated Open Space/Park, however, this plan has not been formally adopted. The current 1975 La Jolla Shores Parks Plan refers to the site as city-owned and states the site should be landscaped. The La Jolla Shores Planned District map shows the site as Single Family. The 1988 La Jolla/La Jolla Shores Local Coastal Plan does not specifically reference the site.

This site is general city property has not been designated or dedicated as open space by the City Council. According to the Parks and Recreation Department, this site is not suitable for open space uses or inclusion in any open space program. The site is currently zoned for single family use. A Conditional Use Permit (CUP) would be required for the use proposed by Hiller.

Hiller of San Diego provides educational resources, religious services, programming and facilities to the local Jewish community, with an existing non-crust campus presence locally at San Diego State University. Nationally, the Hiller organization has led a multi-million dollar fund-raising campaign to develop other similarly proposed sites from Duke University to University of California at Los Angeles.

Staff has documented a high level of concern regarding the potential non-residential development of this site through the CUP process, having received letters from the adjacent homeowners, and through continued dialogue with the community both informally and at presentations at several community groups. These letters have been forwarded to this Committee to be incorporated into the record.

Staff believes that the community’s concerns can best be incorporated into the discretionary land development review process which will include noticed public hearings for the CUP, street vacation, environmental review and traffic study. Hiller will be required to complete this discretionary process as a condition, prior to consummation of the ground lease.

ALTERNATIVES
1. Recommended the formation of a privately funded financing vehicle similar to a landscape maintenance district to landscape and maintain the site as undeveloped.

2. Recommended rezoning of an RFP limiting the use to single family residence.

Respectfully submitted,

[Signatures]

William J. Goff
Real Estate Assets Director

[Signature]

Approved: George J. Loveland
Assistant City Manager

RTC-337
THE CITY OF SAN DIEGO
REQUEST FOR PROPOSALS
LA JOLLA SCENIC DRIVE NORTH AND
LA JOLLA SCENIC WAY

A. PROPERTY DESCRIPTION

1. Location: Northwest corner of La Jolla Scenic Drive North and La Jolla Scenic Way, identified by the City as Site 653.


4. Estimate of Value: $40 per square foot by City staff appraisal as of March 2,2000. Value is for the site in “as is” condition. Initial value to be at least $3,746 per month or $44,502 per year. Note: A street vacation may increase the value.

5. Zoning and Community Plan: The parcel is currently zoned Single-Family under the La Jolla Shores Planned District Ordinance and falls under the La Jolla Community Plan.

6. Size and Shape: The parcel is triangular shaped, and at some portions above street grade. Gross acreage is 0.258 or 11,238 square feet. Total square feet is undetermined and will vary with the development proposed and a potential street vacation.

7. Access: The parcel has grade frontage on La Jolla Scenic Drive North.

8. Easements: Drawings showing slopes, water, sewer, drainage and San Diego Gas & Electric easement locations are attached.

B. PROPOSAL INVITATION

The City is seeking proposals to purchase or ground lease this site on a triple net basis. The property is offered for lease “as is” with development costs to be borne by the lessor. The property is also being offered for sale with the buyer to pay for all closing costs and possible street vacation costs.
C. DEVELOPMENT REQUIREMENTS

A tentative list of the City's development requirements is as follows:
- Environmental Initial Study
- Utility extensions
- Finish grading
- Setback for buildings
- Possible utility relocation depending on development
- Building permits

The above list may not be complete, and proposers are urged to discuss their individual development plans with the City's Planning and Development Review Department for specific requirements.

D. DEVELOPMENT PLAN

Proposers must include a preliminary development plan with their proposals. This plan shall consist of 1) a narrative description of improvements and/or a preliminary plot plan, 2) a financial plan, and 3) a proposed completion schedule.

The selected proposer shall then prepare and submit a complete development plan, consisting of a detailed plot plan, schematic elevations, financial plan, completion schedule, estimated construction costs, and a landscape plan. The plan will be subjected to review and approval by the City. The complete development plan becomes part of the lease and controls development of the premises by the lessee. The development plan incorporated into the lease shall be an expanded and more detailed version of the plan submitted with the selected proposal.

E. FORM OF LEASE

Upon acceptance of a proposal, the City will negotiate a lease based substantially on the terms and conditions contained in Section F. below. However, the City reserves the right to negotiate modifications with the selected proposer to the extent deemed necessary by the City. Proposers requesting special conditions or deviations from these lease provisions should state the exact changes and specify the alternate language in their proposals. Other factors being equal, the City will discount a proposal which requests major or numerous changes that are disadvantageous to the City.
F. LEASE PROVISIONS

1. Purpose. Any use or uses compatible with the Single Family Zone and the La Jolla Community Plan and the La Jolla Shores Planned District Ordinance will be considered. Non-conforming uses requiring discretionary permits from the City may also be considered. The agreed-upon use of space will be specified in the lease. The City Council has directed the City Manager to give a higher priority to non-profit uses based in the UCSD campus.

2. Lease Term. The proposed term must be justified by the proposer on the basis of capital investment in the premises.

Sale Term. All cash with buyer to pay all closing costs. In case of short squeeze, some mapping may be required.

3. Rent. The City suggests an offer of at least $44,057 for the annual rent. Rental offers lower than these will also be considered, but proposers are urged to make higher offers. A flat rate lease will be subject to periodic Consumer Price Index adjustments and revaluations.

4. Records. The lessee will keep complete and accurate accounting records satisfactory to the City from which City can at all reasonable times determine the nature and amount of income subject to rental from the operation of the leased premises. The records will be periodically audited by the City.

5. Right in Assumption and Sublet. The lessee may not assign the lease or any interest therein and may not sublease any portion thereof without prior written approval from the City Manager. The City's approval, however, may be conditioned on the proposer assigning or subleasing agreement to revisions to the lease or the requested sublease to reflect market conditions or City requirements that are then current. Also, no assignee or sublessee will be approved who is not at least comparable to the original lessee in financial and professional competence to operate the leased premises.

6. Compliance with Laws. The lessee shall secure and maintain full compliance with all applicable municipal, county, state, and federal laws and regulations at its own cost.

7. Utilities. The lessee must pay for all utility installations and services required for its operation; all utilities shall be installed underground. Lessee must dispose of all trash resulting from its operations at its own cost.

8. Nondiscrimination. The lessee shall not discriminate in any manner against any person by reason of race, color, religion, gender, sexual orientation, medical status, national origin, age, marital status, or physical disability. Lessee shall comply with the City-adopted program for equal employment opportunities. This 

-3-
program includes requiring the lessee to file an Equal Opportunity Agreement, Work Force Report, and, in some cases, an Equal Opportunity Plan.

9. Insurance. The lessee will be required to carry adequate public liability and property damage insurance, naming the City as an additional insured, in the amount of not less than $1 million combined single limit liability and to hold the City harmless from liability in connection with any and all lease operations. The lessee is also required to carry a policy of fire, extended coverage, and vandalism insurance on all permanent property of an insurable nature located upon the leased premises in an amount equal to the full replacement cost.

10. Taxes. The lessee must pay all taxes and assessments, including possession interest taxes, levied by reason of its leasehold.

11. Default. The City reserves the right to terminate the lease in the event of lessee's failure to cure any curable default or breach within 30 days of legal notice thereof.

12. Encumbrance. Subject to prior approval from the City Manager, the lessee may encumber its leasehold interest by a deed of trust or other security instrument to secure a loan of a specified and approved amount, the proceeds of which and any refinancing thereof must be used exclusively for development of the leased premises, unless an equity participation fee is paid to the City on the take-out portion. The City does not subordinate its ownership interest to any encumbrance.

13. Development Plan. The development of the leased premises shall be in accordance with a general development plan to be submitted by the lessee and approved by the City at the time of execution of the lease. The plan shall show the design, financing, estimated cost of construction, and schedule of completion of the improvements.

Note. This plan is intended to be an expanded and more detailed version of the preliminary development plan submitted as part of the proposal. Substantial deviation from the proposed development plan in the opinion of the City Manager may nullify the City's acceptance of the offer and result in forfeiture of the proposer's deposit.

14. Nonresponsibility. The City of San Diego hereby disclaims any responsibility, liability, or obligation to issue any permits or licenses or to waive any legal requirements by reason of selecting a proposer or executing the lease. The selected proposer will be required to obtain all necessary permits, licenses, and clearances at his/her sole cost.

15. Improvements. Alterations. All improvements and alterations to the premises shall be in accordance with plans and specifications previously approved in writing by the City Manager and shall be at the sole cost of the lessee.
16. **Maintenance.** All maintenance and repairs shall be the responsibility of the lessee without expense to the City. The lessee shall maintain the premises in a clean, safe, and sound condition throughout the lease term to the satisfaction of the City and in compliance with all applicable laws.

17. **Ownership of Improvements.** All improvements, fixtures, and trade fixtures installed by the lessee shall become the property of the City, at City's option, upon termination of the lease. The lessee must remove all movable equipment and personal property upon termination without cost to the City or damage to the premises.

18. **Reservation of City Rights.** All gas, oil, mineral, and water rights shall remain vested in the City throughout the lease term. The City shall have the right to develop said rights and to enter the premises to repair, maintain, or establish municipal services and to grant easements for public utilities and services. Provided, however, the City may not unreasonably interfere with the lessee's rights and must reimburse lessee for any physical damage to the leased premises caused by the exercise of the rights reserved by the City.

19. **Environmental Clearance.** The selected proposer will be responsible for securing compliance with the California Environmental Quality Act of 1970 at his/her sole expense. Appropriate application for environmental review of the proposed improvements and site must be made by the successful proposer upon selection. The City Council cannot authorize execution of the negotiated lease until after all applicable environmental processing has been completed.

G. **PROPOSAL CONTENTS**

All proposals must include, as a minimum, the information specified below. Failure to include this information will seriously detract from a proposal and may be cause for its rejection. The omission of any additional information that will assist in the evaluation is encouraged. The adequacy, depth, and clarity of the proposal will influence its consideration during its evaluation. The proposal submitted must be complete enough for a selection to be made from the material contained in it alone. Proposers are advised to make their best offer in their proposals, as there will be no section on competitive negotiation of this lease.

1. **Summary of Experience.** Whether an individual or the principals in a company, submit identity sufficient to obtain credit information, i.e., complete name, permanent residence, business address, driver's license number, social security number, banking references, etc., and the attached Client Release Authorization Form. Also include a summary or resume of the proposer's experience and qualifications for the type of enterprise proposed.

2. **Financial Statements.** Submit current financial statements listing all assets and liabilities of the proposer, initial available operating capital and its source.
the amount of any borrowed capital proposed for the lease operation and its source and terms of repayment. Also include a statement of estimated gross receipts, projected rent to the City, and operating expenses for the first five years of full operation. Other financial data may be required as determined by the City.

3. **Proposed Improvements.** The proposal must include a preliminary development plan, which consists of a narrative description of improvements and/or a preliminary plot plan of the development, a financial plan, a description of operations and uses, and a proposed completion schedule (see Sections D & F 15).

4. **Proposed Lease Terms.** Specify the requested lease term and justification therefor in terms of investment.

5. **Rental Offer.** For a ground lease, the City recommends an offer of no less than $44,932 minimum annual rent. Proposers are welcome to offer a higher minimum.

6. **Sale Price.** $40 per square foot based on total square footage.

**H. NONCONFORMING PROPOSALS**

The City anticipates leasing the subject property under the terms and conditions outlined in this Request for Proposals. Proposers are encouraged to offer terms more favorable to the City than those specified herein. Proposers should bear in mind the competitive nature of the proposal process and the fact that the City will be looking for the one which offers the best advantage to the City. However, the City may also consider proposals offering alternate terms. The City is not obligated to accept any proposal, whether conforming or nonconforming.

**I. PREPROPOSAL CONFERENCE**

To give prospective proposers an opportunity to ask questions about the lease agreement, proposal submission, or related matters, a preproposal conference is scheduled as follows:

**WHEN:** May 17, 2000, 10:00 a.m.

**WHERE:** Real Estate Assets Department, Large Conference Room,
17th Floor, Civic Center Plaza
1200 Third Avenue, Suite 1700
San Diego, CA 92101

Prospective proposers will find it beneficial to attend the preproposal conference, although attendance is not prerequisite to submitting a proposal. While proposers should feel free to call the Real Estate Assets Department contact person during business hours if questions arise, the preproposal conference is a good forum for discussing questions, problems, and topics related to this Request for Proposals. Moreover, it is not the City's practice to summarize or transmit information on conference discussion items to prospective proposers who fail to attend the meeting.
J. PROPOSAL SUBMISSION

1. Due Date

Proposals must be received at the address listed below no later than 5:00 p.m., Friday, June 5, 2003. Proposals received after that time will not be considered.

2. Place of Delivery

All proposals should be delivered to:

Real Estate Assets Department
17th Floor, Civic Center Plaza
1200 Third Avenue, Suite 1700
San Diego, CA 92101

Attention: Shahrir Afsar, Property Agent

3. Number of Copies

Proposers are requested to submit five complete copies of their proposals. All materials submitted by proposers become the property of the City of San Diego and may not be returned.

4. Contact Person

The proposal coordinator, Shahrir Afsar, is the designated contact person for prospective proposers. He may be reached at the aforesaid address or by telephone at (619) 236-7028.

K. PROPOSAL EVALUATION AND SELECTION

The City will evaluate the proposals as to which one offers the best advantage to the City. The selection criteria listed below are not necessarily in order of importance, nor are they necessarily weighted equally. The City will be the sole judge of the proposals, and its decision is final. However, community groups may be consulted in the selection process.

8. Requirements - The extent to which a proposal clearly addresses the elements of this Request for Proposals is a key factor in selection. A thorough, well-written proposal is essential.

2. Net Rental Offer - The net amount of rent offered the City is an important factor in selection (see Section R).
LETTER

3. **Professional Experience** - The past experience of the proposer in successfully developing and operating similar projects will be a significant factor in proposal evaluation.

4. **Financial Capability** - The proposer must exhibit the necessary financial responsibility and strength to successfully carry out the development.

5. **Development Plan** - The quality, attractiveness, and feasibility of the proposed development is another significant factor in selection.

6. **Special Public Benefits** - Any special public benefits will be considered.

**L. ADDITIONAL INFORMATION FROM PROPOSERS**

The City reserves the right to request additional information from proposers beyond that specified herein. Proposers may also be requested to appear before an evaluation committee, although none is scheduled at this time. However, the City may make a selection based on the information contained in the proposals alone. Therefore, proposers are advised to submit thorough, complete proposals.

**M. QUALIFICATION OF PROPOSAL**

**THIS IS NOT A BID SOLICITATION, AND THE CITY IS NOT OBLIGATED TO ACCEPT ANY PROPOSAL OR TO NEGOTIATE WITH ANY PROPOSER. THE CITY COUNCIL RESERVES THE RIGHT TO REJECT ANY OR ALL PROPOSALS WITHOUT CAUSE OR LIABILITY. ALL TRANSACTIONS ARE SUBJECT TO FINAL APPROVAL BY THE CITY COUNCIL.**

**N. INCURRED COSTS**

The City will not be responsible for any costs incurred by proposers in the preparation and submission of proposals.

**O. PUBLIC INFORMATION NOTICE**

The City holds the names of the proposers and the contents of their proposals in confidence until after the submission deadline has passed and the written Report to Council recommending a selection or other action has been issued by the City Manager. At such time, all proposals become public records and will be available in the Real Estate Assets Department for inspection, except for certain excluded materials which are permanently confidential. These consist of personal financial statements, Application to Lease, Client Release Authorization Form, credit reports, and rating sheets and notes resulting from the evaluation process. Proposers are, therefore, requested to submit the required financial statements on separate sheets.
P. NONDISCRIMINATION NOTICE

It is the policy of the City not to discriminate against the disabled in employment or provision of services. The information contained in this Request for Proposals will be made available in alternative formats to disabled persons upon request.

Q. SCHEDULE OF ATTACHMENTS

1. Maps and Drawings of Site 553

For further information, please contact Shadrac Afshar of the Real Estate Assets Department, 1200 Third Avenue, Suite 1700, San Diego, California 92101. Phone: (619) 236-7628.

SA:jnn-e
5/3/00
(C:\PO(D:\A\Real\RTC-40\RTC-46\Annexure\012-Annexure.doc)

Attachments
Exhibit A. Site 653
Zoning Facts: UCLA Hillel Facility
November 15, 2002

Info Source: City of Los Angeles, Planning Department – Zoning, Building & Safety
Phone: 213-977-8941 and City’s Website

Subject Property: Hillel Facility (new location, just opened)
574 Hilgard Avenue, Los Angeles

Zoning: QR-1-1-VL – “Multiple Dwelling Zone”
Q = “Qualifiability” – Restricts Uses of Property and Assures Development Compatible with the Surrounding Property
1-VL = “Height 45 feet above grade – 3 stories”

Permitted Uses Include:
Apartments, boarding houses, churches, child care facilities, hotels, motels, fraternity or sorority houses and dormitories, schools, elementary and high, educational institutions, museums or libraries, residential hotels, accessory buildings (including private garages, accessory living quarters, guest houses, recreation rooms, or private stables), shelter for the homeless, etc.

Note: Attachments are provided with this document to include the appropriate sections from the “Generalized Summary of Zoning Regulations: City of Los Angeles” as well as related city Code documents.

Attachments:
Generalized summary of Zoning Regulations: City of Los Angeles – 2 pages
City Code: SEC.12.11 – R4 Multiple Dwelling Zone – pages 171, 172 & 173
LETTER

Susan Moore

Attachment to the Transportation/Parking comments

Please find below a detailed description of the University of Santa Barbara Hillel facility, used by the traffic study consultants Kimley-Horn and Associates, Inc. (Suite 301, 517 Fourth Avenue, San Diego, California 92101) in their report entitled: Traffic Generation, Site Access, and Parking Evaluation of Hillel Facility at UC San Diego. (Please note that the project is fictitiously titled, as confirmed by Mr. Milton Priceley, AICP, of Campus Planning at the University of California San Diego there is no such organization Hillel of UCSD. Neither, it should be noted, is there such a facility as “Hillel Facility at UC San Diego”. Indeed, the only Hillel of San Diego facility at UC San Diego is specifically designated shared space with other student organizations. Perhaps the consultant mistakenly used the latter as the project). In a telephone conversation (9/14/04) with Mr. Scott Barker, the consultant employed by Kimley-Horn Associates for this project (whichever one it is) he admitted that he was aware that the project applicant was not in fact Hillel of UCSD, but Hillel of San Diego. He then declined to speak to me further on the grounds that his client wouldn’t like him to get into it right now, which is a shame because I was fascinated by what he had divulged in only three sentences.

For ease of organization I have made my comments as they appear in the document about a facility used as a comparison for Project No. 6098. These comments demonstrate that the proposed Project No. 6098 is unlike the comparison facilities. Therefore the Transportation/Parking discussion on the Initial Study, and the Mitigations proposed for the project under the section Parking in the EIS/MDR should fail and the project require an Environmental Impact Report.

Transportation/Parking

“Due to the somewhat unique nature of the project, the following sources of information were consulted in order to determine the traffic generation and parking demand expected by the proposed project: a survey of existing traffic generation at three Hillel properties at other UC campuses, a survey of students attending
LETTER

Shabbat at the existing Hillel facility at UCSD and a profile of Jewish students at UCSD.” (page 4 of 10 EIS/MND for Project 6698)

Surveys of Other UC Hillel Facilities

“...These surveys identified the trip-making and parking characteristics of Hillel facilities at the University of California campuses in Los Angeles, Berkeley, and Santa Barbara. This information was collected by interviewing site representatives, reviewing public documents, and analyzing data collected at the UCSB Hillel.”

Document

(Obtained directly from the Planning Department in Santa Barbara and produced in full for the response by Susan Moore, 8944 Nottingham Place, La Jolla, CA 92037 to the Draft Mitigated Negative Declaration JD-421438.)

Reminder: As the environmental analyst and relevant attorneys from the San Diego City Attorney’s Office read these comments, I would reiterate the following, taken from the COW 2002 for community planners:

“Substantial Evidence and Significant Effect

Per Section 15384 of the CEQA Guidelines, the key phrases are “substantial evidence” and “significant effect,” when determining whether a Negative Declaration of an EIR is to be prepared.

“Substantial evidence” means there is enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion even though other conclusions might also be reached. Whether a fair argument can be made is determined by examining the entire record. Mere uncorroborated opinions or evidence does not constitute substantial evidence."

From my reading of the UCSB document, research of UCLA and UCSD Hillel sites, and conversations with city planners in both of those cities I have concluded that public and private consultants involved in the preparation of the Traffic Study (approved by staff of the City of San Diego) and the EIS/MND could be considered guilty of biasing their conclusions on “Mere uncorroborated opinion or evidence…” and as such neither document is constituted as “substantial evidence...” As is crystal clear from the UCSB
LETTER

document the comparisons drawn to support the Hillel of San Diego project (in fact the
UCSB project data is utilized by Mr. Scott Barker as approved by City of San Diego staff
as a projection base for the traffic generation for the Hillel of San Diego facility) are
invalid.

There is substantial conflict in evidence, therefore, this project should fail under there
should be a full Environmental Impact Report required for this proposed project as well
as an investigation (undertaken by external auditors) into Land Development and Review
to determine how such a factually “inaccurate” analysis of a project’s traffic, parking and
transportation could be permitted as evidence for a project proposed for City of San
Diego owned land.

Planning Commission Hearing of September 15, 1999

Re: Hillel Jewish Center Final Development Plan and Conditional Use Permit & St.
Michael’s Lot Line Adjustment, Conditional Use Permit Revision and Final

Substantial differences between the UC Santa Barbara Hillel Facility and the
proposed project Hillel of San Diego sufficient to render a comparison between
facilities as a basis for projected use, including, but not limited to traffic circulation
impacts, parking impacts, noise impact as fallacions.

All quotations taken from said Planning Document included as Exhibit ...

Page 2 #4

The front yard set back from the right of way is 10 feet as compared to the need for
a street easement abandonment and narrowing of a collector street for the Hillel of
San Diego proposed project.

RESPONSE
The moveable partition between the sanctuary and social hall would be opened a maximum of twelve times per year to accommodate participants of High Holy Day services, which would constitute four of the twelve special events and eight other special events such as weddings.

The Santa Barbara facility has strict conditions of use imposed on it, permitting the large area to be in use for only twelve events per year.

2.1 Conditional Use Permit Findings [94-CP-75]

Pursuant to Section 35-172.8, a Conditional Use Permit application shall only be approved if all of the following findings are made:

2.1.1 That the site for the project is adequate in size, shape, location and physical characteristics to accommodate the type of use and level of development proposed.

The 0.92 gross acre project is adequate in size...to accommodate the proposed Hillel facility, including the new 10,700 s.f. partial two story structure...

2.1.5 "As discussed in §5.2 of the staff report dated September 7th, 1999, and incorporated herein by reference, the proposed project is compatible with the surrounding residential neighborhood, non-secular uses and university community."

2.1.8 "That the project won't conflict with any easements required for public access through, or public use of the property.

No public easements are present on the subject lot.
2.1.9 That the proposed use is not inconsistent with the intent of the zone district. The intent of the SR-H zone is to provide high density housing for UCSB students. The proposed Hillel facility would serve participating Jewish UCSB students on a daily basis as desired by the individual, and thus, Hillel’s location in the SR-H zone district and its operation under a conditional use permit is appropriate.

Page 10

2.3.3 That streets and highways are adequate and properly designed to carry the type and quantity of traffic generated by the proposed use.

Page 11

2.3.3 cont’d

“The proposed revisions to the St Michael’s existing CUP will in no way affect traffic generation from the site. Thus, streets and highways are adequate and properly designed to accommodate the project.”

2.3.5 That the project will not be detrimental to the health, safety, comfort, convenience, and general welfare of the neighborhood and will not be incompatible with the surrounding area.

“The proposed project will not be detrimental to the health, safety, comfort, convenience, and general welfare of the neighborhood; all parking needs are accommodated and consistent with ordinance requirements and actual facility use. The design of the proposed parking lots, which includes retention of mature trees where possible and integration with the site design of the proposed Hillel facility, ensures that the project will not be incompatible with the surrounding area.”

2.3.9 That the proposed use is not inconsistent with the intent of the zone district. “The St. Michael’s use has been compatible extant within the neighborhood zoned SR-H since 1989. Proposed revisions to the active CUP provide for continued
consistency with the intent of the SR-II zone district by providing religious services to all, including participants from the neighborhood."

Page 14
2.5.3 Conditions have been imposed to facilitate the relocation of existing utilities, infrastructure and easements.
"The relocation of existing utilities and infrastructure will not be required. The lot line adjustment will not affect any easements."

Pages 15 – 25 have been attached with highlighted points indicated on the copy. In addition please note:

Page 24
1. Please note that this project required a CUP, just as had the project on the site prior to the Hillel Foundation @ UCSB applying for the site and the privileges that accompany an extant site with CUP in the specially designated SR-II zone in Santa Barbara.

1. "Total earth movement would be restricted to approximately 1,000 cubic yards,..." as compared to the approximately (underestimated) 7,000 cubic yards of soil cut... for the proposed project on Site 653.

Page 25
"The new structure would be designed to... and would include a worship sanctuary restricted to a maximum occupancy of 133 persons (30 fewer than the maximum occupancy load of 163 persons prescribed by the Uniform Building Code standard of 7 sq. ft. per person)..."

"The movable partition...a maximum of twelve times per year..."
Please note the absolute restrictions on the use of this facility and also note that this facility is for Hillel Foundation of UCSB. Hillel of San Diego is a regional organization.
with NO UCSD affiliation, and designed to serve students from Grossmont College, Palomar College, The University of San Diego, and California State University San Marcos, as well as work in partnership with Hillel of San Diego State University.

Page 27 (copy provided)
Please note all of the conditions of use for Hillel Foundation of UCSB facility, especially:

b. “Hillel shall submit documentation on an annual basis of their ability to park on the University campus or other private property located within one mile of the project site with adequate capacity to accommodate all overflow parking on special event days…”

UCSD has asserted in letters to the community and the City that no such parking can be provided.

Page 36 (copy provided)
Please observe that the proposed project Site 653 located in La Jolla bears no comparisons at all with the Hillel of UCSB Foundation project in zone SR-II in the Goleta area of Santa Barbara.

Please note not just the differences in project zone, site, etc., but the strict building set backs required of the Santa Barbara project.

Page 37 (copy provided)

Page 40 (copy provided)

CONDITIONAL USE PERMIT CONDITIONS

“Any use authorized by this Conditional Use Permit shall immediately cease upon expiration or revocation of this Conditional Use Permit…”

Pages 45-51 (copies provided)
See Attachment F for all of the conditions of approval for this project.
Cumulative Impacts - not taken into consideration.

2-19-2013

Using google to access the Venter Institute website.

Less than one month post-recruitment of the DEIS for Project 212995
**LETTER**

**PROJECT LOCATION**

The Scripps Institution of Oceanography (SIO) Upper Mesa Neighborhood is a "living" area between SIO and the UCSD main campus and is envisioned for the development of facilities that will foster interdisciplinary programs focusing on environmental studies and advance collaborations between SIO, General Campus and Health Science departments. The research activities of the Venter Institute are clearly consistent with the programs now established for this neighborhood.

**PROJECT DESCRIPTION**

The J. Craig Venter Institute (Venter Institute) is a nonprofit research institute dedicated to the advancement of the sciences of genomics, the understanding of its implications for society, and the commercialization of those results to the scientific community, the public and policymakers. Founded in 1992 by UCSD professor J. Craig Venter Ph.D., the Venter Institute is housed in approximately 200 staff and activities, including three members of the National Academy of Sciences and four Nobel Laureates. The Venter Institute operates one of the world's largest and most advanced genome sequencing centers at its Maryland facility; the institute is interested in establishing an additional research center at UCSD.

The Venter Institute has been a leader in the field of genomics research since 1992, producing results with wide-ranging applications in medicine, agriculture, energy, the environment, and biotechnology. As of 2003, the combined operating budget for all Venter-related organizations was $10 million (90 percent from competitive grants). Annual total was over $200 million.

**RESPONSE**

The Upper Mesa area effectively fosters collaboration among the Venter Institute, Scripps Institution of Oceanography (SIO), California Institute for Telecommunications and Information Technology (Cal-IT2), Health Sciences, and the general UCSD Campus.

In December 2008, Cal-IT2, SIO, and the Venter Institute received $47.5 million, seven-year award from the Gordon and Betty Moore Foundation to create a "shockwave" database and computational facility for management analysis of microbial life in the world's oceans. Additional collaborations with UCSD SIO researchers in marine microbiology and genomics are being pursued.

In Health Sciences, collaborations between the Venter Institute and the UCSD School of Medicine and the University of California, San Diego, are being discussed with the Division of Biomedical Sciences and Physical Sciences.

**RTC-365**
UPPER MESA NEIGHBORHOOD PLAN

Four parcels comprise the Scripps Upper Mesa neighborhood. Parcel 4, approximately 1.9 acres and located west of Torrey Pines Road, east of the Park Ecological Reserve, and north of Allen Drive was found to be best fit the Scripps Upper Mesa Mission. Parcel 4 is the largest of the four sites in the neighborhood and was the site to accommodate the project. Without superimposing the view corridors, visibility, mature development, and building design guidelines developed through the Scripps Upper Mesa Neighborhood Planning Study (SUPNS). Access to Parcel 4 is from North Torrey Pines Road.

The SUPNS design guidelines indicated that Parcel 4 should be developed with a one-to-three story building that would be not more than one story in height and not exceed 70 feet from the street. The view corridor would be continuous and connect the four buildings.

The planned building would contain approximately 140,000 square feet. Specific building design will be undertaken by the Scripps Upper Mesa architect and will be subject to UCSD design review and approval.

In order to allow for appropriate landscape design, the plan included a 25-foot landscaped setback from Torrey Pines Road, a 35-foot setback from North Torrey Pines Road, and a 75-foot setback for fire protection from the parcel edge of the Ecological Reserve. Additionally, the buildings would be set back at least 70 feet from adjacent streets.

The neighborhood study calls for the development of surface parking spaces adjacent to North Torrey Pines Road to meet the parking demands associated with all four development parcels. As the Scripps Upper Mesa facility would be a ground level, all associated parking will be required to be accommodated within Parcel 4. Approximately 140 spaces will be provided through a combination of surface and below-grade parking.

ENVIRONMENTAL REVIEW AND PERMITTING

The development of the individual buildings in the neighborhood would be subject to the California Environmental Quality Act (CEQA). Parcel 4 development is planned to be reviewed as an Initial Study/Minor Negative Declaration (OS/MND). The undeveloped site contains mostly non-invasive vegetation and management is planned to be consistent with the 2004 Lang Range Development Plan Environmental Impact Report. Stewardship management of all parcels in the Upper Mesa neighborhood will be addressed and implemented with the development of Parcel 4. This site is within the California Coastal Zone and development will require a Coastal Development Permit.

TIMELINE

Detailed programming and schematic design for the building has recently commenced. It is anticipated that schematic design, environmental review, permits approval, and construction permitting will be completed by June 2010. The project is scheduled to start construction in the fall of 2010 with occupancy expected in 2011.
IV. NEIGHBORHOOD PLAN & PLANNING PRINCIPLES

The site has a unique location, prominent and highly visible to the surrounding streets, but private and secluded to the open space with views of the ocean and hills. The site is relatively isolated from the rest of the campus. It will be a smaller neighborhood than the norm. It occupies a large position between the SIO neighborhoods to the west and Revelle College and the theatre district to the east. The planning principles are designed to perform in the spirit of the Master Plan but also to capitalize on the natural amenities and characteristics of the site. Given the small scale of the development, the plan and design guidelines aim to provide visual coherence to the complex.

A. Relationship to the UCSD Master Plan

As the neighborhood forming the link between SIO and West Campus, the site plan adheres to the ideas of continuity in the Master Plan, namely through a pattern of development, view corridors, pedestrian links and landscape elements. The following principles occur:

- The neighborhood will have a clear community focus via a shared circulation space.
- The neighborhood will have distinct and identifiable edges.
- The "gateway" at the intersection of North Torrey Pines Road, Revelle College Drive, and Expedition Way will be enhanced by extending the existing Park grows into the neighborhood.
- The pedestrian access which converge on this intersection will be continued into the site to the primary pedestrian entry. The Meander, passing through the site parallel to Expedition Way, will provide pedestrian linkages to the Park lands at SIO and other SIO neighborhoods to the west.
- pedestrian corridors along the ch эта districts will be preserved and provide visual linkage between the two neighborhoods.

B. Relationship to the SIO Campus

Although the site is proximate to the West Campus, the site plan adheres to the "spirit" of the SIO neighborhood planning principles. These have been interpreted as having an organic relationship to the land, intertwining buildings and landscape. The following principles occur:

- The buildings are low in scale (two to three stories high).
- The buildings form courtyards oriented towards the landscaps and the views.
- The buildings and landscape elements are intertwined.
- The plan is topographically explicit, emphasizing the views to the west and south, and responding to the shape of the land.

Aida Naessi, Shiel and Associates 18 Tipton Field
C. Landscape Continuity

The landscape concept takes its direction from the rustic and diverse landscapes described in the Campus Landscape Planning Study. Creating continuity in the rustic landscape includes visually tying West Campus and the SIO campus across North Torrey Pines Road, linking the sea to the other SIO neighborhoods and the coastline through the natural coastal sage scrub landscape of the Ecological Reserve's canyon and creating an attractive connection between the campus and La Jolla on Torrey Pines Road. The diverse landscapes of the neighborhood, as in other parts of the campus, can be sheltered or visually anchored by buildings and have their own unique character. The following principles are proposed:

1. Continue the eucalyptus grove of West Campus to the south and west across North Torrey Pines Road into the neighborhood.
2. Retain the Torrey pine trees and add additional Torrey pines along Torrey Pines Road to create a distinctly different character along the west edge of the neighborhood and as residential uses.
3. Bring the character of the low growing shrub of the Ecological Reserve up into the neighborhood on the south and west, but consider summer drought appearance, fire hazard, irrigation, as well as irrigation runoff into the Ecological Reserve.
D. Edges

The site has two distinct edge conditions: one relatively urban, noisy, and public; the other rural, quiet, and relatively private. In order to respond to these conditions, the following principles are proposed:

- Buildings are set back from Torrey Pines Road and North Torrey Pines Road. Landscaping and parking form a buffer to the traffic noise. Street trees screen the buildings from view from the passing vehicles.
- The main spaces in the facilities are to be oriented to the open space and the view. Buildings are to be set back from the common open space extending the landscape of the Skeleton Canyon Ecological Reserve. Buildings form courtyards open to the landscape and the view.

E. Building Massing/Views

The building massing responds to the edge conditions and dominant views to the west, southwest, and south. The principles are as follows:

- Adjacent to the parking lots and the entry road, the buildings are to be three stories.
On the open space, buildings will step down in profile so one and two stories forming courtyards open to the landscape. Uses such as offices, server rooms, or conference rooms will face the view. Lower roofs become landscape terraces.

Building entries will form a passageway linking the parking and the open space.

Circulation

In response to the massing principles for buildings and the buffer zone to noise, vehicular circulation links parking and service areas only. The parking is ingressed in relation to the surrounding streets and screened with planting to reduce its visibility. All service areas are to be screened. Pedestrian routes connect to the major circulation intersections, linking flow traffic from the lower SIC neighborhoods as well as the West Campus neighborhoods to the entries from the parking areas as well as from the local open space.
LETTER

Scripps Upper Mesa Neighborhood Planning Study

Scripps Institution of Oceanography

August 1998

RTC-372
1. EXECUTIVE SUMMARY

The objective of the Scripps Institution of Oceanography (SIO) Upper Mesa Neighborhood Planning Study is to guide future development by establishing a pattern of links to adjacent areas of the campus and defining guidelines for building sites and massing. The document includes the following:

- A development program consistent with the Long Range Development Plan for the University of California, San Diego (UCSD) including SIO.
- A neighborhood plan and planning principles that organize the program and planning requirements and establish the overall development and landscape presence in relation to the surrounding context and design guidelines that support the plan and suggest the character of the buildings and landscapes.

The Upper Mesa Neighborhood site is located at the northeast corner of the SIO campus bordered by Ellen Browning Scripps Street, Tower Road, the UCSD campus, and the Scripps Institution of Oceanography. The neighborhood plan provides for a variety of uses and is designed to accommodate the needs of the Scripps Institution of Oceanography and UCSD.

Development patterns on the site will be guided by the following:

- A planning matrix that considers the relationship between the main campus and the SIO campus, both in terms of circulation and in terms of the landscape. View corridors and vehicular and pedestrian access are the starting point for planning developments.
- The development program for the neighborhood consists of academic and research uses with associated parking. Because of the position of the site at a key interface between the main campus and SIO campus, these uses are designed to take advantage of the resources of both campuses.
- The SIO campus site is a prime candidate for locating in the neighborhood. A site for the US Geological Survey has been discussed as a possible building in the neighborhood. Following on the recommendations of the UCSD Master Plan, the development program calls for 126,000 gross square feet of building area supported by 170 parking spaces.

The planning principles are designed to capitalize on the natural amenities and characteristics of the site, while respecting the spirit of the SIO Master Plan. The plan extends the SIO campus site by adding a fourth characteristic to the circulation path connecting the ocean and the main campus. The series of spaces that begins with the Scripps Plan and continues via Scripps Crossing, a pedestrian bridge, and up the Scripps Ladder culminates in a Belvedere terrace in the Upper Mesa Neighborhood. The Belvedere forms a common link between the development parcels of the site, creating a focal point for social exchange while enhancing the connection to the foreground landscape of Scripps Canyon and the distant view of the Pacific Ocean.
Six key design principles underlie the provisions of the neighborhood plan. These principles reinforce the value of the SIO community and ensure the creation of linkages that tie the principal site to the SIO and the campus as a whole. Supporting guidelines and recommendations for implementation focus on elements of the neighborhood that provide continuity across the boundaries of individual projects or parcels.

- **The Belvedere** is the connecting element for the purview within the neighborhood. A terraced walkway forms a common element that unifies the buildings, providing both visual and functional coherence.

- **The concept of landscape continuity creates connections to SIO by extending the coastal sage scrub of the Ecological Reserve into the site along its western boundary.** The emphatic use of the main campus is accentuated across North Torrey Pines Road to create a landscape connection on the north side of the site, while the Torrey pines along Torrey Pines Road are enhanced through additional planning. The campuswide principles of the "discrete landscape" sheltered or enclosed by buildings is explored on the Belvedere itself as buildings open to defined, landscaped courtyards.

- **View corridors and outlooks are important determinants of form on this site.** The plan identifies a view corridor from the theater district, through the site to the Pacific. The Belvedere serves to frame the views for the buildings of the neighborhood, identifying the main views as an important common amenity. The view corridor plays an important role in the landscape and acts as a buffer to other projects on the main campus, extending a "corridor." The western exposure to the Reserve and the view is either closer or more open. The buildings are more open on this side, and long courtyards that connect to the common open space of the Belvedere.

- **Building form and character respond to the edge conditions and microclimates in ways that enhance the liveness and amenity of the open spaces.** The mass of the buildings steps from three-story height toward the street to one-story height facing the Reserve. Buildings are arranged to form courtyards that can be used as gathering spaces, while roofs of lower parts of the buildings can become terraces.

- **Circulation patterns enhance the connection of the site to its surroundings.** Vehicles, circulation, and parking are used to create a buffer to the two surrounding streets. Taking advantage of the existing grade, the parking is slightly depressed, so that the view of the neighborhood from outside is of buildings rather than cars. The primary pedestrian connection is from the intersection of Expedition Way and North Torrey Pines Road, connecting to Ranville College, which shares some programmatic elements with the planned use in the neighborhood. The pedestrian path up Expedition Way from SIO connects directly to the Belvedere, continuing the spine of the lower SIO campus.
Tree Felling “Error”
Bulk and Scale 26 ft >?
LETTER

Dear Dan,

From: Church, Dan
Sent: September 13, 2008 11:16 AM
To: Stricker, Dan, Vacchi, Robert

Subject: RE: Hill's Code Enforcement Case

The language is fine. Because the main impact of the use, parking, is presently being mitigated by providing parking.

Yours,

Daniel Stricker
Development Project Manager
Affordable/infill Housing & Sustainable Buildings, Expedite Program
City of San Diego
Development Services Department
1222 First Avenue, M.S. 501
San Diego, CA 92101
(619) 446-5251

Please visit our website at http://www.sandiego.gov/development-services/

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RESPONSE

Dear Dan,

From: Church, Dan
Sent: September 13, 2008 11:16 AM
To: Stricker, Dan, Vacchi, Robert

Subject: RE: Hill's Code Enforcement Case

Because CEP had noted I as an action,
we closed since case.

Thanks,

Dan

---

RTC-383
LETTER

Dear Dan,

On Tuesday, September 16, 2008, 2:30 PM,

I sent a letter to Dan,

subject: RE: Hill's Code Enforcement Case

here, I have Planning Commission

tos: A. Vaselli, Deputy Director,

who heads Code Compliance Division,

and Development Services Department

of San Diego

Third Ave., 8th Floor, MS 511

We imagine a community

and code enforcement.

On September 16, 2008, 1:59 PM,

I sent a letter to Dan,

subject: RE: Hill's Code Enforcement Case

hay - thanks. The PC hearing is scheduled for October 16. Please have someone available since I'm pretty sure they

will raise the current use of the site, as they have in the last two community meetings.

Daniel Stricker

Development Project Manager

Affordable/Infill Housing & Sustainable Buildings Expedite Program

City of San Diego

Development Services Department

1222 First Avenue, M.S. 501

San Diego, CA 92101

(619) 456-5251

Please visit our website at http://www.sandiego.gov/development-services/

From: Vaselli, Robert

Sent: Tuesday, September 16, 2008 12:14 PM

To: Stricker, Dan

Subject: RE: Hill's Code Enforcement Case

Dan, the language is fine. Because the main impact of the site, parking, is presently being mitigated by providing parking

on-site, I am comfortable with just monitoring the case until we get a decision. Also, I have not received any

complaints from surrounding neighbors in the year that I have been here with

Robert A. Vaselli, Deputy Director

Neighborhood Code Compliance Division.

RESPONSE
LETTER

From: Church, Rilly
Sent: Tuesday, September 02, 2008 7:39 AM
To: Stricker, Dan; Vecchi, Robert
Subject: RE: Hi! Re: Code Case

Perhaps you should be splitting lucy? I agree with the synopsis. A NOC case can be reopened if project design issues were the primary reason for stopping the building permits and installing.

Project may not ever be completed.

RESPONSE

From: Stricker, Dan
Sent: Thursday, August 28, 2008 5:03 PM
To: Vecchi, Robert; Church, Rilly
Cc: Stricker, Dan
Subject: Hi! Re: Code Case

Bob and Rilly,

Although it appears that both Code and Planning Review believe that an SDP would be required, it sounds as though there is a slight difference in the basis for requiring an SDP (and the subsequent code case). Since this project will be controversial and the discussion is likely to go in many directions, I want us all to be on the same page as to the need for an SDP, and the reason for a code violation which has since been closed. Please correct me if I am wrong.

From your voice mail Bob, it sounds like you are saying that the code action was opened since it was determined that the property was to be a religious use, and not on office use, which triggers the need for an SDP. Rilly is saying (and I am recalling in the SDMC section 150.0.0.0.11) that "A Le Jolie Shores Planned District Permit shall be issued, before the commencement of any work in the alteration of any new building or structure, or remodeling, alteration, addition, or demolition of any existing building.

Since the change of occupancy from residential to office use (whether for religious purposes or not) requires a building permit, then an SDP would automatically be required. The change of use was from residential to commercial, which had different building code requirements, which triggered the need for a building permit. Based on the issuance of an SDP, the need to get this straight and into the hearing documents, as well as be posted in this letter, will be handled.

It really appears as though they would be in violation for not having a building permit before the change of occupancy, and possibly for not having the required number of parking spaces), before not having an SDP. The SDP zone does not permit a church, temple or building used primarily for religious purposes to the use not as an issue. As Rilly notes, the SDP is allowing for continued use of the religious offices. Should the development of the 12,100 SF student center be denied, then I’m thinking we would want to reopen the code case, since the applicant would no longer have a pending SDP application.

I may be splitting hairs, and I apologize if I’m going too far with this, but to be honest, stating it out this helps me to understand it, and also to be able to explain it to members of the community, the applicant, and
Strickler, Dan

From: Church, Billy
Sent: Monday, August 25, 2008 12:25 PM
To: Strickler, Dan
Subject: RE: Hills

I think they mean "change of occupancy", which is a building permit to change from RU to RO dwelling unit to office. The NCCO case has been closed, but the religious office use would require the parking be provided.

Does that help? I can come by.

From: Strickler, Dan
Sent: Friday, August 22, 2008 5:08 PM
To: Church, Billy
Subject: Hills

Hi,

If I remember correctly, even though the applicant keeps mentioning a "change of use" this project doesn't need one since a religious use is allowed in the SF zone of the La Jolla POD, correct?

On another note, apparently there is a code violation case on the SF residence at 8976 Ciffridge. Is it for parking? I need to discuss this in the report as it would be resolved with full project approval or with parking Alternative 1 and 2 for Phase II. Here's what I found in the applicant's draft findings:

The existing single-family residence was constructed according to all codes and regulations in effect at the time it was built. California Building Code requirements for the change of use including an increase in off-street parking and protection of openings. Prior to its use as religious offices, the residence was required to maintain two off-street parking spaces but a previous owner had converted the garage to all office in violation of regulations and the religious office use had not complied to date with the parking requirements. With this approval, six parking spaces will be provided in the residence and when the religious office use terminates with occupancy of Phase II, two off-street parking spaces will be maintained for its reuse as a residence.

Thanks
D

Daniel Strickler
Development Project Manager
Affordable/Infill Housing & Sustainable Buildings Expedite Program
City of San Diego
Development Services Department
1222 First Avenue, M.S. 501
San Diego, CA 92101
(619) 554-5251

Please visit our website at http://www.sandiego.gov/development-services/
Subject: RE: Hille’s Code Enforcement Case

I don’t see anything that needs improving. Let NCC decide whether or not there should be an open case.

From: Stricker, Dan
Sent: Sunday, September 07, 2008 4:02 PM
To: Church, Billy; Vecchi, Robert
Subject: Hille’s Code Enforcement Case

Bob and Billy,

Here is the DRAFT language I am proposing for the FC Report, Code Enforcement Section. Please have a look and provide some recommendations to improving the language. Bob, I’m not sure how to address that the case has been closed. Thanks.

Dan

Code Enforcement Impact:
The owner/applicant converted the use of the existing single-family residence at 9276 Cliffridge Avenue from residential to religious use without obtaining a Site Development Permit (SDP) for City staff evaluation of any required conditions. A Code Compliance Case was opened by the City of San Diego Neighborhood Code Compliance Division of the Development Services Department. Since the applicant has applied for the required SDP at Phase I of the current application, the use of the single-family residence as a religious use has been allowed to continue, pending the outcome of the current application. If Phase II of the application is approved, the religious offices and related use at 9276 Cliffridge Avenue would move into the now 12,108 square-foot facility (Phase II) and the single-family home would revert back to its original use. Should Phase II be denied, the applicant would request the approval of an SDP for Phase I on a permanent basis.

But what was withdrawn by the applicant in 2008!
LETTER

PROPERTY DESCRIPTION

SITE NO.: 675
FILE CODE: PI0C

POAL DESCRIPTION: Fortino Pueblc Lot 1299

LOCATION: La Jolla Village Drive northeast of La Jolla Sceenic Way

EASELY: .31 (23,416 sq. ft.)

ZONING CODE: R1-5000

COMMUNITY PLAN DESIGNATION: University Community Plan designates site as University of California

COUNCIL DISTRICT: 

PUBLIC USE: Institutional

RECOMMENDATIONS:

DEVELOPMENT RECOMMENDATIONS:

COMMENDED RECOMMENDATION: Transportation & Land Use Recommendation - Designate for sale (negotiated to UCSD)

COMMUNITY PLAN TERMINOLOGY: Yes

NOTES:

Housing Commission staff recommends site for housing.

Property has no access to La Jolla Village Drive and is landlocked.

Property is surrounded by UCSD ownership

City Manager's Recommendation - Same as T & L U

Per Council Recol. #230386, 10-9-79, design for sale (neg. to UCSD)

EXHIBIT

RESPONSE
Item 16
May 9, 2017

Brad Werdick
University of California, San Diego
9203 Gilman Drive
La Jolla, California 92037

Re: Venter Institute Site Access Study

Dear Mr. Werdick,

The report summarizes the transportation impacts associated with the development of the Venter Institute, a scientific research and development center, on Parcel 4 of the Scripps Upper Mesa neighborhood. This site is located at the University of California, San Diego within the Scripps Institution of Oceanography. The currently vacant Parcel 4 is located at the southwest corner of the Torrey Pines Road/La Jolla Village Drive intersection. The potential off-site impacts of the project were analyzed at key intersections in the project vicinity under existing with project conditions. In addition, safety, sight distance, and project access were evaluated.

The analysis and recommendations presented in this report reflect opinions of City of San Diego Development Services Department transportation staff. In a meeting on September 26, 2006, City staff indicated they were not supportive of either a left-turn ingress or left-turn egress from Torrey Pines Road into and out of the project site. Preliminary analysis results were presented to the City and they found no reason to depart from City standards by allowing left-turn ingress. In addition, the City commented on the amount of potential conflict to be removed to provide adequate sight distance for vehicles. Their comments are reflected in this report. However, we have presented the results of our analysis with and without the left-turn ingress as a reference for how adjacent intersections would be affected with the movement allowed.

RECOMMENDATIONS

The key findings and recommendations of our analysis are summarized below.

Existing Conditions

- The Torrey Pines Road/La Jolla Village Drive intersection currently operates at level of service (LOS) B conditions during the AM peak hour and LOS C conditions during the PM peak hour.
- The Torrey Pines Road/Glenbrook Way intersection currently operates at LOS A conditions during the AM peak hour and LOS B conditions during the PM peak hour.
- The existing westbound left-turn queue at the Torrey Pines Road/La Jolla Village Drive intersection extends beyond the stop line during the AM peak hour.

Existing With Project Conditions

- The proposed project is estimated to generate approximately 6th AM peak hour, 29 PM peak hour, and 11th PM peak.
- With the proposed project, the Torrey Pines Road/La Jolla Village Drive intersection would continue to operate at LOS B during the AM peak hour and LOS C during the PM peak hour.

10197 Rudder Boulevard, Suite 109, Irvine, CA 92618 (949) 631-3300 Fax (949) 888-1323
www.hastings.com

RTC-393
The Torrey Pines Road/Glenbrook Way intersection would continue to operate at LOS A and LOS B conditions during the AM and PM peak hour, respectively, with the proposed project.

Maximum vehicle queues would not measurably increase.

Evaluation of Project Access

- Access to the project should be provided by a right-in and right-out driveway on Torrey Pines Road.
- The left-turn ingress from Torrey Pines Road would not adversely affect adjacent intersection operations. However, City of San Diego staff indicated they were not supportive of left-turn ingress from Torrey Pines Road because it is designated as a major arterial with limited access.
- The project driveways should be located on the north end of Parcel 4, approximately 300 feet south of the Torrey Pines Road/La Jolla Village Drive intersection (measured from the curb-return of the intersection).
- The internal intersection between Parcel 3 and 4 should be configured as a traditional "T" intersection. The side approaches should be controlled by stop signs while vehicles entering the site from Torrey Pines Road should not stop.
- A raised median should be constructed on Torrey Pines Road from La Jolla Village Drive to the southern edge of Parcel 4 to prevent left-turn through movements.
- A curb on Torrey Pines Road should be extended (approximately 2'6" feet) from its current terminus south of La Jolla Village Drive to the proposed project driveway to ensure clear corner sight distance.
compared to counts used in the University's 2004 Long Range Development Plan. The recently
estimated counts during the PM peak hour match closely with those previously published.

Figure 1 displays the AM and PM peak hour traffic volumes, lane configurations, and traffic
control devices at the study intersections.1

Levels of Service and Queues

The traffic volumes displayed on Figure 1 were used to analyze existing traffic operations at the
study intersections. The study intersections currently operate acceptably, according to City
standards, at LOS B conditions during the AM peak hour and LOS C conditions during the PM
peak hour. Technical calculations are included in Attachment B.

The calculated 95th percentile westbound left-turn queue at North Torrey Pines Road/La Jolla
Village Drive is 556 feet. This exceeds the storage provided by the left-turn pocket and extends
beyond the adjacent intersection, with La Jolla Scenic Drive, which is approximately 330 feet to
the east. During the peak hours, left-turn queues can fill the storage area between the two
intersections. In the field, the left-turn queue can only be 250 feet before it becomes a queuing
issue at the adjacent intersection. For the remainder of this report we have presented the
calculated queues (250 feet) regardless of the distance to the adjacent intersection. The
calculated queue was reported because it allowed for direct comparison between the calculated
queues of the various project scenarios. This allowed us to determine if the proposed project would
worsen an existing queuing problem.

EXISTING WITH PROJECT CONDITIONS

This section describes the potential near-term traffic impacts of the proposed project on the
surrounding roadway system.

Project Description

According to the Scripps Upper Mesa Neighborhood Planning Study and University staff, the long
term or planned development for Parcels 1-2-3 would consist of 185,000 square feet of
scientific research and development uses. The initial project on Parcel 4 is the first project to be
proposed in this portion of campus and would consist of 45,000 gross square feet of scientific
research and development facilities. The development schedule for Parcels 1-3 is unknown.

Figure 2 in Attachment A shows the Parcel 4 site plan. Access to Parcel 4 would be provided by
an underlaid driveway on Torrey Pines Road. Evaluations of this driveway are described in
greater detail in the Evaluation of Project Access section of this report.

The only proposed access to Parcel 4 is the driveway on Torrey Pines Road; however, with the
development of Parcels 1-3 a full access roadway would be constructed at some point in the
future on Expedition Way. This connection is not assumed with development of Parcel 4 only.

1 Attachment D contains the raw traffic count sheets. The volumes shown in the figures have
been manually adjusted between adjacent intersections as part of nearby University-related
projects.
Trip Generation

We estimated the trip generation of the proposed project for AM and PM peak hour conditions using trip rates and percentages published in Trip Generation Manual, City of San Diego Municipal Code, May 2003 and site information obtained from University staff. The City’s trip generation rates closely match parameters for the research and development center land use category from Trip Generation 7th Edition, Institute of Transportation Engineers, 2003, which is a well-documented resource and typically used in traffic engineering throughout the country. The rates used in this analysis are consistent with the University’s Long Range Development Plan. Table 2 summarizes the estimated trip generation for Parcels 1-4 of the proposed project.

| Parcel | Land Use                | Amount (KSF) | Trip Rates | Trips |          |          |          |          |          |          |          |          |
|--------|-------------------------|--------------|------------|-------|----------|----------|----------|----------|----------|----------|----------|
|        |                         |              | Daily  AM | % of AM |        | Daily  PM | % of PM |        | Daily  AM | % of AM |        | Daily  PM | % of PM |
| 1      | Research and Development| 32.5         | 30        | 16%     | 14%    | 300      | 4        | 45       | 4        | 35       | 56       |
| 2      | Research and Development| 32.1         | 37        | 16%     | 14%    | 297      | 4        | 41       | 4        | 33       | 29       |
| 3      | Research and Development| 25.0         | 30        | 16%     | 14%    | 305      | 2        | 32       | 2        | 26       | 25       |
| 4      | Research and Development| 45.0         | 55        | 16%     | 14%    | 365      | 6        | 56       | 5        | 45       | 50       |
| Total  | Land Use                | 130.2        | 157       | 17      | 179      | 15       | 125      | 15      |


As shown, the Venture project (Parcel 4) is expected to generate 360 daily trips, including approximately 80 AM peak hour trips and 90 PM peak hour trips. These trips were assigned to the project driveway and adjacent roadway interactions.

Trip Distribution

We determined the expected distribution of project trips onto the adjacent roadway network based on existing traffic volumes, the location of complementary land uses, and previous development studies from the University. The following is the expected trip distribution:

- Destinations: Parcel
- To/from the east on La Jolla Village Drive: 80%
- To/from the west on North Torrey Pines Road: 25%
- To/from the southeast on Torrey Pines Road: 35%
- Total: 100%
| LETTER RESPONSE |

![Image of a letter response page with tables and graphs showing data analysis.](image-url)
SUN DIEGO — September 20, 2011 — The J. Craig Venter Institute (JCVI), a not-for-profit genomics research institute, today held an official groundbreaking ceremony for its new San Diego facility. The JCVI building, designed by JCP Architects, will be a home to the institute’s new “Biomes” facility, which will enable it to build the biomes of the future.

“We are thrilled to be breaking ground on this new building project on our campus of JCVI. The new building will be a major component of our research mission to develop the biomes of the future. We are very excited to be able to provide this new facility for our scientists and engineers to work on,” said J. Craig Venter, President and CEO. “The new building is a key component of our overall strategy to build a world-class facility that will be home to the world’s premier genomics and biotechnology research.”

The new building will be a major component of the institute’s overall strategy to build a world-class facility that will be home to the world’s premier genomics and biotechnology research. The building will provide state-of-the-art facilities for the institute’s scientists and engineers to work on, including laboratories, offices, and meeting rooms.

The new building will be a key component of the institute’s overall strategy to build a world-class facility that will be home to the world’s premier genomics and biotechnology research. The building will provide state-of-the-art facilities for the institute’s scientists and engineers to work on, including laboratories, offices, and meeting rooms.

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Site 653: Public Parking
Historical perspective.

19.9.

[OCR generated text from the document image]
Why the change?

9b.
LETTER

From: Hopkins, Gregory

Sent: Monday, August 28, 2006 8:08 AM

To: Stricker, Dan; Weston, Don; Aguilar, Adolfo

Cc: Lindsay, Stephen; Strominger, Jeff; Broughton, Kelly; Sherwood, Allison; Casem, Labo

Subject: RE: Hilll site access

Dan,

If the owner the lot relinquished the access rights along La Jolla Scenic Way via a map or drawing, I can send a document that reveals the access rights along a portion of the road if it makes sense safety wise, etc. We can talk about it in more detail if needed.

Gregory P. Hopkins, PLS
Senior Land Surveyor
Deputy City Engineer
Development Services Department
City of San Diego
Office: 619.465.8201
Fax: 619.465.8499
shopkins@sandiego.gov

RESPONSE

From: Stricker, Dan

Sent: Friday, August 28, 2006 3:18 PM

To: Weston, Don; Aguilar, Adolfo

Cc: Lindsay, Stephen; Strominger, Jeff; Broughton, Kelly; Sherwood, Allison; Casem, Labo; Hopkins, Gregory

Subject: Hilll site access

Don,

We have received a memo and a fax regarding a limitation of site access to the Hilll site. I have scanned and attached both the Fax from Sue Moore that Kelly received, and the memo that Allison Sherwood received from Clive Greiger. Both documents refer to 30-year-old city documents which discuss curb cut and access restriction to the Hilll site. The documents discuss restrictions from La Jolla Scenic Way to the site, which is the option proposed site access location. Were these restrictions simply department policy at the time, or did actual access rights relinquishment occur and get recorded for this site? We need to research the origins of these actions, as it will come up at the hearing.

Did the City buy the previous owner of the site? Did the City as prior owner of Hilll (the vacant portion of the project site) relinquish access rights to La Jolla Scenic Way on a map or a street dedication drawing? Base maps or the subdivision maps which delineate the streets might show it. These can be found in the legal description - I think 1257 is one of them. It’s on the title sheet.

It should have shown up on the Title Report, but it could simply be drawn a map with nothing included in Title or the City owned the site back then. If the rights were officially relinquished and recorded, we might be able to use a “reversion action” as this hearing to reverse (remove) the relinquishment and take care of it all at the pending hearings for the project.

Jeff Strominger has been instrumental in providing input on the kind of research we need to do and the possible action we need to take. I’d like to sit down with you, Adolfo, and Labo next week to discuss after the research is completed.

RTC-412
LETTER

1222 First Avenue, M.S. 501
San Diego, CA 92101
(619) 446-5251

Please visit our website at http://www.sandiego.gov/development-services/

From: Sherwood, Allison
Sent: Monday, September 8, 2008 3:05 PM
To: Stricker, Dan
Subject: FW: Hilltop parking garage access, Project No. 169493

Hi Dan – did you ever resolve the access rights issue? I have more comment letters with the same issue. Thanks, Allison.

From: Stricker, Dan
Sent: Thursday, August 21, 2008 9:06 AM
To: Lindsey, Stephen
Cc: Broughton, Kelly; Brookinger, Jeff; Sherwood, Allison; Gezem, Labb
Subject: RE: Hilltop parking garage access, Project No. 169493

Thanks Steve,
In my reviewing Sue Moore’s fax, although the general concern (site access) was the same, the questions asked were somewhat different from those asked by Pat Granger (and answered) when Labb and I met with her on August 16. Such questions are more focused on decisions made by City staff regarding site access and why we aren’t implementing staff position on access some of which were made over 30 years ago. Sounds more like questions on D&O policy. Let me know if meeting with Labb and I would help.

Dan

Daniel Stricker
Development Project Manager
Affordable/Infill Housing & Sustainable Buildings Expedite Program
City of San Diego
Development Services Department
1222 First Avenue, M.S. 501
San Diego, CA 92101
(619) 446-5251

Please visit our website at http://www.sandiego.gov/development-services/

From: Lindsey, Stephen
Sent: Thursday, August 21, 2008 7:11 AM
To: Stricker, Dan
Cc: Broughton, Kelly; Brookinger, Jeff; Sherwood, Allison

RESPONSE
Stricker, Dan

From: Stricker, Dan
Sent: Monday, September 08, 2003 3:43 PM
To: Sherwood, Aladdn
Cc: Qassim, Labib; Hoganl, Gregory; Aguiler, Anado
Subject: R.E. Hill parking garage access, Project No. 148497

Abutters rights were not officially relinquished (nothing recorded against the property), when the dedication of the streets occurred. I'm going to ask Labib to add it and butt up the following before it gets put into any response letters.

Given the current classification of La Jolla Village Drive as a [Major] Street, staff is requesting that the applicant relinquish abutter's rights (access rights) to La Jolla Village Drive as a part of the current action, going forward. (Greg) - should the applicant include this in their PROW Vacation exhibit, and should we include some language in the Vacation Rate? Do believe that Adolfo is going to provide me with that language, no?)

Labib also mentioned having the applicant relinquish a portion of their access rights on La Jolla Scenic Way, where the project proposed to take their access. Labib's thoughts were to allow access to the site on La Jolla Scenic Way, but to have the applicant relinquish their access rights from a certain distance on either side of their entrance, to the closest intersecting streets. This idea may beg the question, why are we allowing access from La Jolla Scenic at all? I haven't received further information, or justification for allowing access from Labib as of yet, other than the following reasons why the applicant has chosen to take access off La Jolla Scenic Way:

1. Site Access. There are a number of reasons that the applicant has chosen to access the site from La Jolla Scenic Way, including the following:
   a. Community opposition to access for cars and pedestrians from La Jolla Scenic Drive.
   b. Access from La Jolla Scenic Way would require a longer driveway, to meet city driveway slope regulations, and wouldn't allow for the number of parking spaces that the project is providing.
   c. Placing the driveway at the low side of the site makes for the shortest driveway possible, especially given the cutting into the hill, necessary to provide underground parking.
   d. Access from La Jolla Scenic Way results in more on-site open space.

Labib - please provide us with some additional information here, I.e., why are we in support of access off La Jolla Scenic Way, and why are we proposing the relinquishment of a portion of La Jolla Scenic Way?

Thanks
Dan

David Stricker
Development Project Manager
Affordable/Infill Housing & Sustainable Buildings Expedite Program
City of San Diego
Development Services Department
Site # 653 Parking - weekday c. 11am
Parking situation recorded in response to MND. La Jolla Scenic N. [“LJSN”] and adjacent roads 9/24-29/04

Photos and video taken primarily during Yom Kippur (special event) and on Wednesday 9/29/04, midmorning (daily parking by UCSD students and staff).

Neighborhood is heavily impacted by both types of parking usage.
UCSD student/staff parking, Wednesday 9/29 c. 11am
Daily parking impact
LJ Scenic Drive.
Parking around Site 653
Pedestrian and auto traffic,
Yom Kippur
Parking along LJSN, Yom Kippur
Traffic Mitigation
LETTER

Stricker, Dan

From: Henegar, Lesley
Sent: Wednesday, September 24, 2008 11:01 AM
To: Stricker, Dan
Subject: RE: LU Designation Area west of the Hilli site

Dan,

Sounds like you could put Public Facilities/Institutional as the land use. It is owned by UCSD so they will do with it as they see fit. It is not under city jurisdiction.

Lesley

From: Stricker, Dan
Sent: Tuesday, September 23, 2008 4:04 PM
To: Henegar, Lesley
Subject: RE: LU Designation Area west of the Hilli site

I need to include something about LU Designation in the project data sheet. Do I just say none since it's under the control of the State? The La Jolla NOP map shows it as just white, whereas the University of LU map shows UCSD as "Public Facilities/Institutional."

Daniel Stricker
Development Project Manager
Affordable/Infill Housing & Sustainable Buildings Expedite Program
City of San Diego
Development Services Department
1222 First Avenue, M.S. 501
San Diego, CA 92101
(619) 446-5251

Please visit our website at http://www.sandiego.gov/development-services/

RESPONSE

From: Henegar, Lesley
Sent: Tuesday, September 23, 2008 5:38 PM
To: Stricker, Dan
Subject: RE: LU Designation Area west of the Hilli site

Dan,

There was no aerial attached. But the land to the west of Torey Pines and south of Le Jolla Village Drive is UCSD and has no land use designation. So, no information. Send the aerial if you can so that I can be sure of the parcel in question, but that's what I think it is.

Lesley
Stricker, Dan

From: Lewis, Larry
Sent: Wednesday, September 24, 2008 12:10 PM
To: Stricker, Dan

RE: Hillel #149437

Ok, they may need to exit 95 people from the garage and 381 people from the ground floor based on chapter 10 of the CBC.

Again this has nothing to do with the actual number of people in the building or the actual number of cars generated.

---Original Message---

From: Stricker, Dan
Sent: Wednesday, September 24, 2008 7:38 AM
To: Lewis, Larry
Subject: FW: Hillel #149437

Larry - let me send this to you again, in case you deleted it. Look at the legend on the drawing, which breaks down the 12,100 SF of floor space by use. This is a two story building, with the main floor level being a 17,000 SF garage, and the ground floor being the 12,100 SF religious student center.

This was and will be a very controversial development, which has a long history with the Planning Commission and the City Council. Many opponents claim an occupancy load number that no one has confirmed (to the best of my knowledge) and said that the project should be paked based on this occupancy load. I want to confirm the occupancy load and then explain how it has nothing to do with the project's parking requirements.

Daniel Stricker
Development Project Manager
Affordable/Infill Housing & Sustainable Buildings Expedite Program City of San Diego Development Services Department
1222 First Avenue, M.S. 501
San Diego, CA 92101
(619) 446-5261

Please visit our website at http://www.sandiego.gov/development-services/

Sorry I can not.

They don't have the square footages, there is only 1 floor plan, due to lack of activity on this job I signed off some time ago I recycled the plans.
I do not know for what purpose you want a occupant load calculated, structural only does this to make sure people can exit safely.

Mechanical does this to make sure they have the correct number of plumbing fixtures.

-----Original Message-----
From: Stricker, Dan
Sent: Tuesday, September 23, 2008 4:24 PM
To: Lewis, Larry
Subject: PM: Hillel # 149437

Larry,
Can you please tell me what the official occupancy load for this site would be, based on the attached project site plan? Thanks Dan.

Daniel Stricker
Development Project Manager
Affordable/Infill Housing & Sustainable Buildings Expedite Program City of San Diego Development Services Department
1222 First Avenue, M.S. 501
San Diego, CA 92101
(619) 446-5221

Please visit our website at http://www.sandiego.gov/development-services/

-----Original Message-----
From: Medan, Bob
Sent: Tuesday, September 23, 2008 10:14 AM
To: Stricker, Dan
Subject: RE: Hillel # 149437

Dan, occupant load is calculated by the structural plan checker. It is not part of the fire review.

Bob

-----Original Message-----
From: Stricker, Dan
Sent: Sunday, September 21, 2008 5:17 PM
To: Medan, Bob
Subject: Hillel # 149437
Stricker, Dan

From: Lewis, Larry
Sent: Wednesday, September 24, 2008 7:53 AM
To: Stricker, Dan
Subject: RE: Hillel # 149437

Sorry I can not.

They don’t have the square footages, there is only 1 floor plan, due to lack of activity on this job I signed off some time ago I recycled the plans.

I do not know for what purpose you want a occupant load calculated, structural only does this to make sure people can exit safely. Mechanical does this to make sure they have the correct number of plumbing fixtures.

-----Original Message-----
From: Stricker, Dan
Sent: Tuesday, September 23, 2008 5:42 PM
To: Lewis, Larry
Subject: FW: Hillel # 149437

Larry,
Can you please tell me what the official occupancy load for this site would be, based on the attached project site plan? Thanks Don

Danial Stricker
Development Project Manager
Affordable/Infill Housing & Sustainable Buildings Expedite Program City of San Diego Development Services Department
1222 First Avenue, M.S. 501
San Diego, CA 92101
(619) 446-5251

Please visit our website at http://www.sandiego.gov/development-services/

-----Original Message-----
From: Medos, Rob
Sent: Tuesday, September 23, 2008 10:14 AM
To: Stricker, Dan
Subject: RE: Hillel # 149437
LETTER

POST-APPENDIX

RESPONSE
CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

SUBJECT: OPEN SPACE PRESERVATION AND MAINTENANCE
POLICY NO: 008-23
EFFECTIVE DATE: December 11, 1984

BACKGROUND:

Open Space provides the citizens of San Diego with such benefits as scenic vistas, preservation of natural resources, outdoor recreation potential, and other general benefits to the public health and welfare; thus preservation of open space has been a major goal of the City for many years. In May, 1958, the City's Planning Department published a report, "Open Space for San Diego," that laid the foundation for open space preservation efforts. Subsequently, in May, 1978, the City Council adopted by Resolution R-208180 "A Plan for the Preservation of Natural Parks for San Diego" as the official Open Space Element. That Plan served as a guide for all actions involving open space until February, 1979, when the City Council adopted the current Open Space Element of the Progress Guide and General Plan for the City of San Diego (Resolution R-222918).

Also, in 1978, the citizens expressed their desire to preserve open space by approving Proposition C, which authorized the sale of $.5 million in general obligation bonds to purchase open space properties. In preparation to the passage of Proposition C, the City Council adopted an ordinance establishing the San Diego Open Space Park Facilities District, which has boundaries coextensive with the City limits. This district is empowered to acquire, construct, improve, maintain and operate park facilities.

PURPOSE:

The purpose of this policy is to identify the various means by which open space may be retained, acquired and preserved, and to define management and maintenance responsibilities.

DEFINITIONS:

1. Open Space - Designated

   Designated Open Space consists of a system of canyons and canyon-oriented lands in the natural state that have utility for park and recreation purposes. The Designated Open Space system is identified in the Progress Guide and General Plan, in adopted Community Plans and/or in adopted Specific Plans. This system forms the basis of the City's Open Space preservation efforts.

2. Open Space - Non-Designated

   Non-Designated Open Space as herein defined consists of areas adjacent to Designated Open
CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

Space that may provide visual or physical access to the Designated Open Space system or otherwise serve to enhance that system. Non-Designated Open Space may consist of natural, disturbed, or manufactured slopes.

3. Sensitive Lands

Sensitive lands as herein defined consist of areas of land or water in the natural state which because of their unique characteristics or location have significant value for preservation for environmental or historic reasons. Sensitive lands are identified as such in adopted Community Plans and/or in adopted Specific Plans and are more fully defined in the Progress Guide and General Plan.

4. Open Space Retention List

Following the passage of Proposition C in 1978, the Open Space Retention list was created and adopted by the Council. The purpose of the retention list is to assist the Council in making acquisition decisions. An updated revision to this list was approved by the City Council on November 21, 1983 (Document No. RR-259603). This list, which currently includes 141 Open Space systems within the City, is a score and category ranking of each system on the basis of 13 evaluation criteria which were approved by Council. System on the list include all those areas identified in Community Plans as open space as of the time of the list's preparation. This list also provides a "recommended method of retention" for each area, in that funds available are not adequate for the purchase of all systems listed. When development plans are reviewed which include any of these areas, attempts will be made to retain as much as possible of the Designated Open Space.

It is the Council's policy that this Retention List is for planning purposes only and may be amended by Council from time to time. Persons owning property identified on the Open Space Retention List may utilize their property in conformance with Zoning and other legal requirements.

POLICY

It is the goal of the City to preserve open space. This may be accomplished by: (1) Retention of City-owned lands; (2) Acquisition of fee title; (3) Acquisition of easements.

1. Retention of City-owned Lands

City-owned properties identified as Designated Open Space shall be retained in City ownership for Open Space purposes.

CP-000-21
Page 2 of 6
CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

City-owned properties identified as Sensitive Lands or that satisfy the definition of Non-Designated Open Space should also be retained in City ownership for Open Space purposes, but if sold, they should be considered by an Open Space easement.

2. Acquisition of Fee Title

It is the goal of the City to acquire Designated Open Space. Generally, this land would be acquired in fee title, although easements may be obtained in lieu of fee title under unique circumstances. This may be accomplished by: (a) Purchase; (b) Assessment District; (c) The development process; (d) Donation; (e) Property exchange.

a. Purchase

The City may from time to time acquire Designated Open Space areas through the use of Proposition C funds or other land sources that may be available in accordance with the Open Space Retention List.

b. Assessment District

Special Assessment Districts may be formed under provisions of State Law or under provisions of the City's own procedural ordinance for the purpose of acquiring Designated Open Space properties. Assessment districts for Open Space acquisition may be initiated by either the City Council or by petition from a community desiring acquisition. The City's policy on acquisition of Open Space by assessment district is found in Council Policy 600-31.

c. The Development Process

The City may obtain title to Designated Open Spaces through the development process as a condition of subdivision approval, through negotiation of a Development Agreement, or as a mitigating measure of an Environmental Impact Report. In addition, it may occasionally be in the City's interest to acquire title to Non-Designated Open Space or Sensitive Lands through the development process. In these cases, staff may recommend that Council accept the property because of its value to the City's Open Space preservation goals.

d. Donation

Occasionally, a citizen or group of citizens may wish to donate land to the City for preservation as Open Space. The City's policy governing the acceptance of such donations is found in Council Policy 600-31.

e. Property Exchange
CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

The City may occasionally acquire Open Space by means of property exchange. City policy governing property exchange is covered by Council Policy 700-10 and Municipal Code Section 32.0902.2.

3. Acquisition of Easements

In lieu of fee title, it is the policy of the City to preserve Non-Designated Open Space and Sensitive Lands through the application of easements. Easements for Open Space shall be distinguished by two categories dependent primarily on the desirability of public access and the designation of maintenance responsibilities: (a) Positive Easements; (b) Negative Easements.

a. Positive Easements

Where public access is deemed desirable, a "Positive Easement" should be obtained which provides for public use. A Positive Easement may also allow for such public improvements as landscaping, hiking trails, bikeways and other compatible recreational facilities. In such cases, the Open Space area should be identified as a separate parcel.

b. Negative Easements

Where public access is not deemed desirable, the City may preserve the Open Space through the acceptance of a "Negative Easement" which serves to restrict improvements on, or changes to, the character of the area. Where Open Space is to be preserved in this way, the property should be "flooded out" in such a manner as to remain a part of the contiguous legal lot in order that it can be privately-owned and maintained by each individual property owner. An exception is in the case of any planned-development where there is a property owner's association which can own and maintain open space. In this case, it may be preferable for the Open Space area to be identified as a separate parcel.

OTHER METHODS OF PRESERVATION:

Occasionally, through the development process, the City and the developer may agree to other methods for the preservation of Non-Designated Open Space or Sensitive Land areas. This may include density transfer or a rezoning to Residential or Recreational, as appropriate. A Reserves Review, agriculture, or large-art residential land division. It is not the intent of the City however to unilaterally apply such methods solely for the purposes of preserving open space.

OPEN SPACE MANAGEMENT

The City Manager shall keep an up-to-date inventory of all City-owned open space. A major purpose of this inventory is to provide the City's maintenance program. Positive Open Space easements shall also be shown on this list.
CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

MAINTENANCE:

It is the policy of the City to assume responsibility for the maintenance of City-owned Open Space as well as Open Space for public use by virtue of a Feasible Easement. Maintenance may be financed with City funds, or in the case of City-owned Open Space where the community desires a higher level of maintenance, an Assessment District may be established for that purpose. Maintenance of Open Space areas subject to Negative Easements shall be the responsibility of the individual property owner or property owners association.

Where the City has assumed responsibility for maintenance, the level of maintenance provided shall be no less than that required by law of private owners of undeveloped property, i.e., primarily litter abatement and control of fires hazards.

Litter abatement in open space will include removal of accumulation of wind blown paper, debris, discarded material and the control of illegal dumping. Fire hazard control in open space will include those measures recommended by the San Diego Fire Department that will reduce or eliminate any imminent threat to human life or property. Closure of trails or access points that allow off-road vehicle access resulting in actual or potential environmental damage will be provided. Roads, trails and paths that are considered necessary in, through, or connecting open space system areas will be kept clear and passable. Periodic inspection will be provided to ensure acceptable site conditions and that deficiencies are reported and corrective actions taken. All open space areas will be cleaned at least once a year.

The provisions of the above paragraph, as well as other provisions of this Council Policy, shall have the sole effect of providing guidance to the City Manager. Nothing contained in this policy shall serve to create any legal obligation which is not otherwise imposed by law on the City. By establishing this Policy, it is not the intent that the City be legally obligated to provide the above-specified services. All of the above services may or may not be completed and are subject to budgeting and the availability of funds.

DEDICATION FOR PARK PURPOSES:

City owned open space may be dedicated for park purposes in accordance with Section 55 of the City Charter. Dedication is intended for those areas that have been determined to fit criteria of resource-based parks.

The City policy on dedication of Open Space lands for park purposes is covered in Council Policy 700-17

CROSS REFERENCE:

CP-606-22
CITY OF SAN DIEGO, CALIFORNIA
COUNCIL POLICY

Council Policy 760-10
Council Policy 760-17
Council Policy 660-31
City Charter Sec. 55

HISTORY:
Adopted by Resolution R-216010 05/19/76
Amended by Resolution R-254869 09/24/81
Amended by Resolution R-262139 12/11/83
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<th>Time Frame</th>
<th>Responsibility</th>
<th>Funding</th>
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<td>Within 5 years</td>
<td>Planning Department</td>
<td>Fee revenue, redevelopment, grant funds</td>
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LETTER

CASEY GWON, City Attorney
ANITA M. NOONE, Assistant City Attorney
LISA D. O'BRIEN, Deputy (BEN 147126)
HELEN A. MINNIOZA, Deputy (BEN 12539)
DAVID A. RING, Deputy (BEN 212839)
Office of the City Attorney
Civil Division
1500 Third Avenue, Suite 1150
San Diego, California 92101
Telephone: (619) 554-5100
Facsimile: (619) 554-6583
Attorneys for Respondents CITY OF SAN DIEGO and CITY COUNCIL OF THE
CITY OF SAN DIEGO

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
CENTRAL DIVISION

LA JOLLA HIGHLANDS
HOMEOwers, a non-profit
association,

Petitioner,

vs.

CITY OF SAN DIEGO, CITY COUNCIL
OF THE CITY OF SAN DIEGO; and
DOES 1 through 25, inclusive,

Respondents,

BILLER OF SAN DIEGO, a non-profit
corporation, and DOES 26 through 50,
inclusive,

Real Party-In-Interest,

I, Francis M. Devaney, declare and state:
1. I am an attorney duly licensed to practice before all of the courts of the State of
California.
2. I am employed by the Office of the City Attorney, Civil Division, and have
participated in the Office of the City Attorney's representation of the City on this matter. During the
course of our representation, I spoke with D. Wayne Gledhill, who represented the Petitioner, on
several occasions. During the course of these conversations, I made clear to Mr. Gledhill that the
City agreed with the City's position that City staff were working with advising the City Manager that Site

DECLARATION OF FRANCIS M. DEVANEY
LETTER

253 was designated as single-family residential property. Based upon such advice the City Council acted on November 20, 2000. Mr. Brechtel and I agreed that on such date, Site 253 was designated as open space. Based upon our agreement, I believed it would have been in the City’s best interest to accommodate such a football issue and I would have been willing to accommodate such a fact.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 25th day of March, 2005, at San Diego, California.

[Signature]

DECLARATION OF FRANCIS M. DEVANEY

RESPONSE
LETTER

The City of San Diego

REPORT TO THE PLANNING COMMISSION

DATE ISSUED: November 1, 2001
REPORT NO. P-01-186

ATTENTION: Planning Commission Agenda of November 8, 2001

SUBJECT: La Jolla Community Plan and Local Coastal Program Update. Process 5

REFERENCE:
1. Letter to the Planning Commission No. P-00-654,
2. La Jolla Community Plan Update Informational Workshop,
3. Letter to the Planning Commission No. P-01-219,
4. La Jolla Community Plan Update Workshop.

SUMMARY

Issues - Should the Planning Commission recommend that the City Council adopt the October 2001 (Revised October 25, 2001) Draft of the La Jolla Community Plan and Local Coastal Program Update, the October 2001 La Jolla Public Facilities Financing Plan, the associated reasons and the associated amendments to the Progress Guide and General Plan as well as recommending reconsideration of the Addendum LDR No. 40-0749 to EIR DEP No. 92-0199 and recommending revocation of the currently applicable Policy documents listed below?

Staff's Recommendation -
1. Recommend Consideration of Addendum LDR No. 40-0747 to Environmental Impact Report DEP No. 92-0199 (Enclosure 1);
2. Recomponents of the October 2001 (Revised October 25, 2001) Draft of the La Jolla Community Plan (Plan) and Local Coastal Program Land Use Plan (Enclosure 2) and associated amendments to the Progress Guide and General Plan and the Local Coastal Program;
3. Recommend Adoption of the October 2001 Draft La Jolla Public Facilities Financing Plan (Enclosure 3);
4. Recommend Redesign of the 1972 La Jolla Community Plan (amended in 1978 and 1988), the 1972 La Jolla Shores Precise Plan (amended 1976), the 1983 La Jolla - La Jolla Shores Local Coastal Program, the 1995 La Jolla Community Plan, and the 1980 Bay Avenue Plan;
5. Recommend Adoption of the proposed rezones as shown on Zoning Map No S-4179, B-4174, C-914 and the proposed amendments to the La Jolla Planned District Ordinance (see Attachments 1).

RESPONSE
BACKGROUND

The La Jolla Community Plan and Local Coastal Program Land Use Plan is the City of San Diego's adopted statement of policy for growth and development of the La Jolla Community Planning Area for the foreseeable future. The plan proposes specific goals, policies and strategies regarding the future preservation, use and development of land within La Jolla and identifies how the use and development of that land will affect current levels of public services and facilities.

The community plan for La Jolla that is currently in use is a combination of the 1976 community plan (for areas within the Coastal Zone) and the 1995 community plan (for areas outside the Coastal Zone). From 1987 through 1995, the La Jolla Community Planning Association as well as other La Jolla community groups and subcommittees worked with City staff to achieve a consensus on community issues and to produce the 1995 La Jolla Community Plan (LJCP).

Update and the associated revisions to implement it. The 1995 LJCP was replaced and recommended for approval by the Planning Commission and was approved for adoption by the City Council in January of 1995. Since a portion of the community is in the Coastal Zone, the proposed update was then sent to the State of California Coastal Commission (CCCC) for their review and certification before becoming effective. However, it was never certified due to various concerns from the CCC, primarily among them public view and coastal bluff protection, and therefore did not become effective in the Coastal Zone although it is in effect outside the Coastal Zone. The proposed October 2004 draft community plan update represents a combination of the 1976 and 1995 La Jolla Community Plans, the La Jolla Shores Precise Plan, the La Jolla / La Jolla Shores Local Coastal Program and other documents.

After receiving a CCC grant in January 2004 for the purpose of updating the La Jolla Community Plan, City staff held an informational workshop with the Planning Commission on March 23, 2004 to identify the plan issues to be addressed. At that time, the Planning Commission identified the specific issues. Staff has worked with the La Jolla Community Planning Association (CPA) in the context of presentations at their regularly scheduled meetings and has held three meetings with the planning group Plan Update Subcommittee to identify and address proposed changes. At the planning group meeting of November 2, 2000, the community group voted unanimously to acknowledge the current progress of the Community Plan Update and to look forward to its completion. The vote also included the community group's deep concerns about language included in the plan regarding wire extensions. These concerns were raised in 1995 and the CPA has not received any response from that position. In December, 2000, City staff held a workshop with the Planning Commission at which several issues were identified. These issues are addressed in the Discussion section of this report.

During 2001, City staff has continued to work with the La Jolla Community Planning Association and all interested parties to identify and address issues, and a July 2001 draft plan was sent to approximately 170 people in the community as well as to 20 City staff for their review and comment on July 10, 2001. The October 2001 (Revised October 25, 2001) draft Plan...
application and implementation as well as Multiple Habitat Planning Areas (MHPA) mapping in the Natural Resources and Open Space System Element of the draft Plan update.

Issues identified / Recommendations made by the Planning Commission at the December 2000 Workshop:

A. Site 653: Retain the open space land use designation on the triangular site at the corner of La Jolla Village Drive and La Jolla Sxctic Drive North.

- City staff has reviewed this site, which was reclassified from single-family residential to open space with the City Council approval of the 1995 Plan that became effective outside the coastal zone only. Site 653 is outside the Coastal Zone.

- A City Council action has directed staff to retain this site as an income-producing property. The staff is therefore preparing a reclassification of the site from open space to single-family residential. Staff acknowledges the December 2000 Council direction was made based on the understanding that the land use designation of the subject site was single-family residential when, in fact, it had changed to open space with the Council approval of the 1995 Plan. The information was not known at the time the City Council decided that the City should receive income from this property.

- It should be noted that all of the community organizations in La Jolla, including the City-recognized groups (the La Jolla Community Planning Association (CFA) and the La Jolla Shores Advisory Board) have voted unanimously to retain Site 653 as open space. A letter reflecting this view is included as Attachment 3 to this report. The City Council notes their desire to classify this lot as dedicated open space. In addition, the City has received approximately 50 letters from the community in support of retention of the site as open space. A copy of those letters will be available for the commissioners' review at the public hearing.

B. Coastal Access Subarea Maps Terminology Definitions: Brief language consistent with the Local Coastal Plan should be added to define the terminology (e.g., View Corridor) in order to clarify the intent of the subarea maps' graphics.

City staff has added definitions to the terminology of all of the Visual Access Subarea maps.

C. Cultural Complex Boundary: Change the boundary to include the La Jolla Recreation Center and the Bishop's School.

City staff concluded that since the land use designation on the Community Land Use Map (Figure 1) for the Recreation Center is more appropriately shown as Parks/Open Space and the land use designation for Bishop's School is appropriately School, these should not be included as part of the Cultural land use designation. However, in order to highlight the historically-designated Recreation Center, Bishop's School and Scripps Clinic (being developed as residential) as important components of the cultural life of La Jolla, staff has identified these...
PLANNING COMMISSION RESOLUTION NO. 3266-PC

RECOMMENDING ADOPTION OF THE LA JOLLA COMMUNITY PLAN
AND LOCAL COASTAL PROGRAM LAND USE PLAN UPDATE,
ASSOCIATED AMENDMENTS TO THE PROGRESS GUIDE AND GENERAL PLAN
AND THE LOCAL COASTAL PROGRAM,
ADOPTION OF THE PUBLIC FACILITIES FINANCING PLAN,
ADOPTION OF PROPOSED REZONES AND AMENDMENTS TO THE LA JOLLA
PLANNED DISTRICT ORDINANCE,
RECISSION OF CURRENTLY APPLICABLE PLANS,
AND CONSIDERATION OF ADDENDUM LDR NO. 40-0747 TO EIR NO. 93-0199

WHEREAS, on November 8 and December 6, 2001, the Planning Commission of the City of
San Diego held a public hearing to consider recommending adoption of the Draft La Jolla
Community Plan and related actions; and

WHEREAS, it has been six years since the La Jolla Community Plan has been updated and
adopted for use outside the Coastal Zone, and twenty-five years since the La Jolla Community
Plan has been updated and adopted for use in the Coastal Zone; and

WHEREAS, a number of City-wide Policies and Regulations have significantly changed or been
placed into effect in the intervening years since the last Community Plan update; and

WHEREAS, the physical build-out of the community of La Jolla has changed significantly in the
intervening years since the last Community Plan update; and

WHEREAS, the Planning Commission of the City of San Diego considered all testimony and
evidence; NOW, THEREFORE:

BE IT RESOLVED, by the Planning Commission of the City of San Diego that it hereby
approves and recommends to the Council of the City of San Diego for confirmation that the
information contained in Addendum LDR No. 40-0747 to Environmental Impact Report (EIR)
No. 92-0199 has been completed in compliance with California Environmental Quality Act and
State CEQA Guidelines, that said EIR reflects the independent judgment of the City of San
Diego as Lead Agency that the final EIR has been reviewed and considered prior to
approving the project; and

BE IT FURTHER RESOLVED, by the Planning Commission of the City of San Diego that it
hereby approves and recommends to the Council of the City of San Diego for adoption the
Addendum No. 40-0747 to EIR No. 92-0199; and

BE IT FURTHER RESOLVED, by the Planning Commission of the City of San Diego that it
hereby approves and recommends to the Council of the City of San Diego for adoption the Draft
La Jolla Community Plan and Local Coastal Program subject to the Planning Commission
recommended changes as stated in this resolution; and

RTC-446
BE IT FURTHER RESOLVED, by the Planning Commission of the City of San Diego that it hereby approves and recommends to the Council of the City of San Diego the revision of the 1976 La Jolla Community Plan (amended in 1984), the 1985 La Jolla Community Plan, the 1972 La Jolla Shoreline Precise Plan (amended 1976), the 1983 La Jolla/La Jolla Shores Local Coastal Program, and the 1980 Pico Avenue Plan; and

BE IT FURTHER RESOLVED, by the Planning Commission of the City of San Diego that it hereby approves and recommends to the Council of the City of San Diego for adoption, amendments to the Progress Guide and General Plan to incorporate the above updated plans; and

BE IT FURTHER RESOLVED, by the Planning Commission of the City of San Diego that it hereby approves and recommends to the Council of the City of San Diego for adoption the 2001 Draft La Jolla Public Facilities Financing Plan; and

BE IT FURTHER RESOLVED, by the Planning Commission of the City of San Diego that it hereby approves and recommends to the Council of the City of San Diego for adoption the proposed revisions and amendments to the La Jolla Planned District Ordinance; and

BE IT FURTHER RESOLVED, by the Planning Commission of the City of San Diego that the following changes to the proposed October 2001 Draft La Jolla Community Plan are recommended:

1. Vertical (Physical) Access to Shorelines
   Staff should identify general "candidate" areas (if any) for future potential vertical shoreline access across private property based on the criteria stated in Item p., page 46 of the Plan, which is consistent with the Land Development Code criteria.

2. View Corridor at the Terminus of Public Streets
   Staff should define/show graphically the extent of the protected view zone at the ocean terminus of public streets that are identified as view corridors.

3. Designated Open Space Definition on Open Space System Map (page 36)
   Staff should clarify the definition of Designated Open Space to indicate that this may include private property as well as City-owned property.

4. Site SS (Located at La Jolla Village Drive and La Jolla Scenic Drive North)
   Staff should retain the land use designation of A-1d in as Designated Open Space, and research if there is any City criteria for Mid-Parks or if there is a mechanism that would allow the community to improve and maintain the property as open space.

5. Telecommunications Facilities in Parks/Open Space
   Staff should include a policy in the Plan that states that all development in Parks should be analyzed for visual impact, and that the inclusion of telecommunication structures in those areas should be consistent with the Citywide Telecommunications Policy (currently being developed).
## LETTER

**FROM:** 1985 LA JOLLA COMMUNITY PLAN - WITH SITE W O.3 CARRIED OUT FOR 2001 PLAN UPDATE

**ACTION PLAN**

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## RESPONSE
After the City Attorney had
given legal advice that the project is not acceptable,
involved, so they would be able to have more families coming together. And my task was to work with several rabbis in San Diego to help set up an air-route boundary. And an air-route boundary, for those of you who, who might not know what this is, is, is a symbolic demarcation. And it is set up in a manner so that those people from the orthodox Jewish faith can carry or push their children on the day of the Sabbath. And you do this in different ways. And it's done all throughout the country. And I had received a call from several rabbis throughout the San Diego region, and they had asked me to participate in this. And it was so important to them to have this air-route boundary, and to be able to use the lines of Shabbat because this would enable them to attract more and more people from around the country, around the state, to be able to participate in their temple to be able to take their families on the day of the Sabbath to their organization. And so we worked on this. We worked on finding a way to make sure that you could participate on the day of the Sabbath and be able to go from a private domain to a public domain. And this is something that to me also began to educate to me that there is diversity, there are different approaches that different organizations and different individuals take in finding their comfort zone. And I respect that. And I don't see this as an extension of UCSD, particularly because this is an organization that
No, only prohibition is removed. They have to go out and look for a site off UCSD. They have a legal requirement to look for a site off the campus. They're gonna work with the students at UCSD. They're gonna work with students all throughout San Diego. And it is a larger, larger issue for all of us here. But I think what is interesting is that some of the people in the community have, that there is going to be lots of noise, that this is going to be turned into a, maybe some sort of fraternity house, sorority house. That there's gonna be all sorts of students going back and forth, and disrupting the neighborhood and so forth. And I find that just not to be true. And, and what I'd like to do, if possible, is I'd like to talk to David Singer to possibly talk about his experience with the etc. at UC Berkeley and what it is that they've been able to do in terms of partnering up and, and working with the neighborhood.

Singer

My name is David Singer. I, I'm a, live in San Diego. I'm an active leader at the etc. organization up there. And I can tell you that any claim that it is a disruption to the community is absolutely false. We hold events there every single night and every single night, if you walk past the building, you cannot hear a sound coming out of it. There is sound inside, but it is quiet outside because everything there is held with respect and the building itself is built in a manner that allows for it to be
built within the neighborhood, and hold large events without disturbing other residents. [Inaudible] answers your question.

It does. Thank you. I, I think what we've also, I think what we've also seen here is that the supporters here really have presented a compelling case as to why this neglected piece of City-owned property should be redesignated in the Community Plan to conform with the underlying zone. Since 1976, this property has been zoned as single family. And there really is no adequate alternative site. Site six- 675 has been talked about, but that, too, is not adequate. That is about a third of the size, third of the size, it's on a steep slope, and the university has been on record as denying access to it. This property as we have heard does not meet the characteristics of open space, and park and recreation is on record as saying the site is unsuitable for a park, the community groups have opposed this. This, but it does not appear to me that they gave Hillel a fair hearing on the matter or considered the relevant facts about its limited purpose for park or open space. And I don't think that they speak for all of the neighbors and La Jollans that support Hillel and its proposed use. And as creative as the slide show or PowerPoint presentation was, I don't believe that the picnic setting is an often occurrence. I think it looked to me to be a little bit staged. The 1935...
No. The designation was misrepresented and incorrect.

Community Plan designation of site 653 was considered by Council November of 2000, when it did approve exclusive negotiations with Hillel as noted by the record. The acreage of open space and parks in this neighborhood is abundant, and we have not even taken into consideration the beaches and the open space and recreation fields at UCSD. Two hundred and ninety-one acres and forty-five acres, respectively. La Jolla's recreational acreage is greater than that of most communities in this City. I believe that Hillel of San Diego has shown their ability to be sympathetic to the concerns of the immediate neighbors by designing a project that will mitigate its impacts and to provide generous landscaped areas, all at great expense to this non-profit agency, even though these same neighbors have continually refused to meet with Hillel to discuss their issues. There is significant economic benefit to all the citizens of San Diego by generating revenue from a remnant parcel that has been an economic burden to the City for close to 40 years.

The other campus ministries that have facilities near UCSD have demonstrated their ability to be good neighbors, and Hillel will be one, too. Students at these other facilities have been able to walk across the street from the campus to attend to their organizations of faith. As has been, as has been eloquently demonstrated today, the Hillel students are an asset to the City of San Diego, and they have
demonstrated their leadership and their participation in community service projects throughout the City.

The development and landscaping of site 653 will provide a needed buffer from the noise and traffic of La Jolla Village Drive. Based upon these mutually beneficial goals, I would propose the following motion as an amendment to the La Jolla Community Planning as to site 653. And this would be the implementation regarding site six five-, site 653. And I'd like to read this into the record. My motion would be to designate [BREAK IN TAPE] [TAPE OVERLAP NOT TRANSCRIBED] as low-density residential the City-owned parcel known as site 653 at the intersection of La Jolla Village Drive, La Jolla Scenic Way and La Jolla Scenic Drive North. If the adjacent cul-de-sac and excess right-of-way on La Jolla Scenic Drive North are vacated or otherwise made available for inclusion in the development of site 653, site 653 by the City of San Diego, then development of it and site 653 shall be viewed in the context of a single-development plan, and shall be consistent with the permitted uses and development regulations of the single-family zone of the La Jolla Shores Plan District Ordinance. In addition, if the adjacent cul-de-sac, cul-de-sac and excess right-of-way on La Jolla Scenic Drive North are vacated or otherwise made available for inclusion in the development of site 653, any development will provide for landscaped open
space in an aggregate area of not less than 10,000 square feet. And I think what this does, it really does set...

Madera

Second.

Insuarza Thank you. It really does set the tone and the basis for what I think will allow us to have an institution and an organization there that will be able to complement the neighbors, that will be able to complement their religious faith, and finally, and just as important, that will be able to complement what all of us are trying to do. And that is to be good, good San Diegans, to be good Americans, and to work with one another in order to prosper and better improve our standard of living. Thank you.

Murphy

Mr. Peters.

Peters Thank you, Your Honor. I do want to be brief, because I want to have everyone have a chance to, to vote on this frankly. I want to say how impressed I am with the level of the discussion this time. I think the first time around both sides there was a little hyperbole. And I also want to thank Mr. Insuarza because his predecessor on this issue said some things that I think unnecessarily riled up some people. And, in particular, I want to thank you for the tone. He’s kind of carried the ball for Millie on this, and I think he’s done it respectfully. I want to say, also, that I, I think both sides present a righteous position in this case. I don’t think that there’s,
Sue Moore
Public Comment: June 7th, 2005

Mayor Murphy, Honorable Council Members

Last year I attended the first hearing of the changes, spearheaded by Council Members Atkins and Frye, to the process of Closed Session. That day, and in future discussions, there was detailed consideration of the Brown Act, and the interpretation thereof by the then City Attorney, and City Council as a body. It appeared to me, that the proverbial tide was turning towards a form of government that would embrace greater openness on behalf of our elected and appointed city officials; a process that would honour greater public participation in what has been a seemingly impenetrable Closed Session process. So imagine my astonishment, shock, and fury, on Saturday morning as I saw the map on the front page of the Union Tribune. Seven pieces of public land for sale, without public notice, to be discussed in Closed Session on June 7th. Why did I have such a response? Because earlier that week I had left a message with Will Griffiths (not my first) to ask him whether Site 653 was to be recommended for purchase, and to ask for READ’s report on that process. I had also spoken to Gary Halbert in DSD. He knew nothing of any such report. Then Bob Karcia, project manager for that Site returned my call on Thursday afternoon. He knew nothing new, and in fact had recently called Mr. Griffith’s to ask for information. My question is this. How was I, as an interested community member to find out about the potential discussion and possible disposal prior to the project’s City Council hearing? I would have spotted the item during my weekend “Closed Session period” but what notice would that provide me with to talk to others, scramble for documents, place phone calls, and so on?

This morning I had delivered to the offices of the City Attorney, City Manager, and director of READ, letters specifically requesting notice for any council hearings about Site 653. I hope that they will be honoured. There is however a much broader, and much more important issue than my personal reaction to the map. What is the process for the disposal of public land? Who? Which members of the City Staff, and who amongst the elected officials determines the selection process? Are residents of San Diego intended to find out by accident or design whether a piece of their local community is about to be
sold? Why doesn't the Project Manager know that there is an important report and potentially critical decision to be made about his or her project?
8944 Nottingham Place  
La Jolla  
CA 92037  
4/02/05

Dear Mr. Griffith:
I left a voice mail message earlier this week to ask you whether the Site 653 (Project 6908) is slated to be considered as a Closed Session real estate item prior to the penalized in City Council hearing of June 7th, 2005. At the advice of Ms. Hughes, I read the relevant docket for 4/04/05 that has no mention of the item. Bearing in mind the strong community interest in this Project, would you be kind enough to contact me should such a Closed Session discussion be proposed. Timely notice would offer the elected and appointed La Jolla community leaders an opportunity to prepare a Public Comment document.

Thank you,

Sue Moore  
(858) 459-6758  
sue@mail.ucsd.edu
LETTER

Project No. 212995
Hillel Center for Jewish Life

3/11/13

Resolution No. R-2012-129, Accepting the Citygate Report as the City Framework to Address Fire-Rescue Services Deficiencies in the City, and Accept the Working Group’s Proposed Implementation Plan to Correct those Deficiencies.

In 2006, at the City Council hearing for Project No. 6098, the future use of Site 653 was discussed in relation to a then current plan discussion in the District 1 of San Diego community. At that time, Site 653 once again was called out as a potential location for a Fire Station to better serve UCSD as well as the increasingly populated areas surrounding the transit corridors. UCSD was called out as priority 9, in the most recent - current - report for Fire Station facilities to meet not just the daily impacts, but in consideration of the impacts of drier years and increased wildfire risk, in the San Diego region.

I have not attached the entire Citygate LLC, report to the City Council, but note the resolution adoption as the record for the report submitted for the November 14th, 2011 meeting, and trailed to November 15th 2015.

Thank you,
Sue Moore

RESPONSE

AJ-1 The comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No additional response is required.
Although the project is intended to provide religious facilities for UCSD students, it is not affiliated with UCSD. Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “... is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

The project site is located within the City of San Diego and is thus under the jurisdiction of the City of San Diego. Any prior shared parking agreement with UCSD is not related to the current potential environmental impacts of the proposed project.

The Existing with Improvements Alternative would likewise be allowed at the proposed location.
LETTER

AL-1 I am a resident of the neighborhood which would be directly impacted by the building of a student gathering place across La Jolla Village Drive from UCSD. The small tract of land on which the student hangout would be built has been a much-needed buffer between our homes and the traffic and activity to the north. This is especially true now that the large Venetian Institute is burgeoning just to the west. Incidentally, the plan is to narrow La Jolla Scenic Drive by two feet. Traffic in our area should be shielded from the huge amount of Torrey Pines Road and La Jolla Village Drive, but instead, drivers have discovered they can detour through our neighborhood and avoid the light at Torrey Pines Road and La Jolla Village Drive. It already is a problem, but that problem promises to multiply. Add to that a backup of traffic caused by ingress and egress into and out of this facility.

AL-2 It's been projected that one of five students will drive to the new activity facility. So four of five cross La Jolla Village Drive at the heavily trafficked intersection with Torrey Pines Road. The "no turn on red" sign is often ignored. Students in dark clothing--at night--dangerous!

AL-3a Our family neighborhood is being bombarded. There is a safe pedestrian overpass from the University to the Village shopping center, where there are and have been other facilities available for ideal student centers. But Hillcrest has insisted on this triangle in a totally residential area. It is an inappropriate use of the land, which should be dedicated open space. Let's preserve a few places in San Diego which are not overwhelmed by development!!

Mary Messner

RESPONSE

AL-1 The comment represents the opinion of the commenter and does not raise an issue related to any substantive issues or to the adequacy and/or accuracy of the EIR. No further response is required.

AL-2 The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City's Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

AL-3a A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

Therefore, the traffic concerns noted by the commenter are less than significant.

AL-3b The intersection identified by the commenter has adequate lighting and pedestrian crossing signals. As discussed in EIR Section 4.2.3, traffic hazards were determined to be less than significant.
CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.
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<tr>
<td>In regards to the comment that the project site be “dedicated open space,” EIR Section 3.6.1 states:</td>
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<td>Site 653 was also evaluated for potential incorporation into the City’s Park and Recreation Department’s open space inventory in November 2000. As detailed in a City memo from the Director of the Park and Recreation Department (McLatching 2000), the parcel did not meet the City’s definition as an open space parcel, as it is “completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value.</td>
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The comment expresses the opinions of the commenter. The cumulative traffic impacts are adequately analyzed in Section 4.2.3.1(a) of the EIR. The project would have a less than significant impact for reasons detailed therein.

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

With respect to increased traffic through the neighborhood, potential traffic impacts under the Phase 1/Phase 2 project relating to adding trips to the street system are adequately analyzed in EIR Section 4.2.3.1(a). Potential traffic hazards under the Phase 1/Phase 2 project are adequately analyzed in EIR Section 4.2.5.1(a).

The project would provide adequate parking and would not impact the neighborhood. Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly.
area." The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.
Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

Additionally, any loss of off-street parking would be less than significant. The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.
AN-1 This comment is an introduction to comments that follow.

AN-2 Religious organizations are allowed to host temporary events in rented facilities on the UCSD campus. However, the project entails a permanent facility used primarily for religious purposes. The applicant is not aware of any available space on campus that UCSD is planning to sell or lease for long-term use. Absent available space that UCSD is willing to sell or lease to Hillel, the project cannot be located on campus.

Please see EIR Section 9.1 for a discussion of the alternative locations considered for the project. Additionally, Hillel owns the project site and there is no requirement that Hillel forego use of the project site that it already owns to satisfy a commenter’s subjective preference that the project be located on the UCSD campus.

AN-3 The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access driveway. Access from Torrey Pines Road would be eliminated. The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.
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<td>AN-4</td>
<td>Section S5 of the EIR is within the Executive Summary, which does not fully analyze project alternatives; rather, it only summarizes the findings contained within EIR Chapter 9.</td>
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With respect to the project’s analysis of alternative locations, CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the
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<td>AN-4 (cont.) objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.</td>
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<td>AN-5</td>
<td>This error was revised in the Recirculated EIR (December 2013).</td>
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<td>AN-6</td>
<td>The Final EIR has been revised to include all issues related to the Existing with Improvements Alternative within the alternatives chapter of the document. This revision will provide clarity to the reader. As stated in FEIR Section 9.2.1, the Existing with Improvements Alternative would permanently use the Cliffridge property to provide for religious programs for Jewish students at UCSD including meetings, one-on-one counseling, and administrative offices. Permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the Municipal Code would be required for the permanent use.</td>
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<td>AN-7</td>
<td>The Existing with Improvements Alternative would result in the permanent use of the Cliffridge Property as the Hillel facility. Both the proposed project and the Existing with Improvements Alternative would provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD. This use is allowed at this location. Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “... is to provide for the religious needs of Jewish students on the university campuses in San Diego County.” As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center”</td>
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as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

The Existing with Improvements Alternative would provide six standard parking spaces (one as handicap-accessible). Pursuant to the City Municipal Code, this would provide adequate parking for the proposed use. Impacts would be less than significant.
As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.

See response to comment AN-8.
AN-10 The EIR adequately details the existing transit conditions in Section 4.2. It would be speculative for the EIR to attempt to assume what may or may not occur with funding for public transit. Furthermore, as detailed above, the majority of visitors to the project site would be able to walk from the UCSD campus.

AN-11 The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

AN-12 See response to comment AN-11.
AO-1 The City as Lead Agency followed all EIR noticing requirements under CEQA (see, for example, Section 15087 of the CEQA Guidelines). The Notices of Availability of the Draft EIR were widely distributed to agencies, organizations, and individuals who were known to have an interest in the project. In addition, the notice was published in the San Diego Daily Transcript. The notices included a website indicating where the Draft EIR could be found.

At all times the Draft EIR was also available during the public review period at the offices of the City of San Diego Development Services Department located on 1222 First Avenue, Fifth Floor, San Diego, California 92101. Copies of the Draft EIR are also available at the following public libraries:

- San Diego Public Library, Central Library, 820 E Street, San Diego, California 92101
- La Jolla Branch Library, 7555 Draper Avenue, San Diego, California 92037

This EIR was made available for review on the City’s website at: http://clerkdoc.sanmet.gov/Website/publicnotice/pubnotceqa.html. Also, the environmental document could have been provided in CD format if requested.

The cost to make a hard copy of the EIR is typically around $100 due to copying costs.

AO-2 The Recirculated EIR (December 2013) included additional details the Site 675 Alternative, including the location which is shown on EIR Figure 9-1.
AO-3 The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

AO-3 Right of Way Vacation: The DEIR fails to properly determine whether the proposed Right-of-Way Vacation (which is required for the project) is lawful. Findings for a street vacation by the previous City Council have been set aside by the courts. The proposed street vacation must go through the review process again. SDMC Section 125.0941 requires that ALL of the following findings must be made to approve a street vacation:

a. There is no present or prospective public use of the public right-of-way, either for the facility for which it was originally required or for any other public use of a like nature that can be anticipated;
   i. There is a present and prospective public use for the right-of-way. While a park has significant value, it would come at the cost of losing a current cul-de-sac in the right-of-way which is being used for both vehicular traffic and parking.

b. The public will benefit from the action through improved use of the land made available by the vacation;
   i. There is a loss of benefit in that parking will be lost and the street will be narrowed. Decreasing the width of the street is problematic and a safety issue.

c. The vacation does not adversely affect any applicable land use plan; and
   i. The vacation is for the purpose of developing a facility, which is at odds with the surrounding low density residential use, and is contrary to the La Jolla Shores Planned District Ordinance.

d. The public facility for which the right-of-way was originally acquired will not be detrimentally affected by the vacation.
   i. Vehicular traffic will be affected and the cul-de-sac providing both a place for turning around and parking will be lost.
The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

There is no requirement under CEQA to detail what local planning groups may or may not have stated regarding past iterations of the proposed project.
The size and bulk of the project is two to three times that of other structures in the vicinity and therefore are not in conformance with the La Jolla Shores Design Manual. The project will be disruptive of the architectural unity of the area. The proposed structure setbacks are not in general conformance with the setbacks of other structures in the vicinity.

Phase 1/Phase 2 Option: Hillel is proposing “three individual structures with an overall building square footage of approximately 6,500 square feet, situated around a central courtyard” (page 3-8).

- These three buildings are grouped together around a courtyard. They appear as one large structure as opposed to three distant buildings spread out evenly on the lot.
- This is in SIGNIFICANT contrast to the homes directly across the street. These lots are approximately 16,000 square feet in size with homes of approximately 2,000-2,3000 square feet set in the middle of each lot.
- The bulk and scale of this building is NOT consistent with the La Jolla Shores Design Manual guidelines of “unity with variety” and “bulk & scale”.

Existing with Improvements Option: Hillel is proposing to convert a single-family home at 8976 Cliffridge Ave to permanent office and administrative use for Hillel.

- Using a single-family home for administrative offices is not an allowed use within the single family residential zone of the La Jolla Planned District.
- Would not be able to buy/sell/use single family homes as offices be a SIGNIFICANT impact for both Land Use and Neighborhood Character.

Overall, the project design is consistent with the LJSDO and Design Manual. The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

The Existing with Improvements Alternative would result in the permanent use of the Cliffridge Property as the Hillel facility. Both the proposed project and the Existing with Improvements Alternative would provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD. Either would be an allowed use in this location.

Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “… is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”
As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

The ability to buy/sell homes is not a CEQA impact; however, as stated above, the facility is an allowed use in this location and the project design would be consistent with the neighborhood character. See response to comment AO-7.
AO-9a  Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

AO-9b  Speculating about what other spiritual organizations potentially could or could not do is beyond the scope of this environmental review. Each proposal would be required to go through land use and environmental review appropriate for the proposal.

AO-9c  See response to comment AO-9a.
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<td><strong>AO-10a</strong></td>
<td>As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.</td>
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<td>The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.</td>
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<td><strong>AO-10b</strong></td>
<td>The project represents a religious use which, like other churches, temples, and places of worship, would inherently include some accessory uses, which are considered part of the primary use. As detailed in Section 3.4.2 of the EIR, the proposed project would include multiple component parts which support the primary use of project (see response to comment I-1). Besides the library/chapel, religious activities would take place in the lounge and meeting rooms, as well as the outdoor courtyard space. The kitchen would be used to prepare traditional meals during religious holidays. Bathrooms are necessary for religious staff members and visitors. A shower is necessary to encourage bicycling to the site and a commonplace within facilities of this nature.</td>
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<td><strong>AO-10c</strong></td>
<td>As discussed in response to comment AO-8, the proposed use is allowed at this location and does not require a CUP. Details of project operation would be enforced through conditions of project approval. See response to comment AO-10a.</td>
</tr>
<tr>
<td><strong>AO-10d</strong></td>
<td>The proposed use is not consistent with the activity of a single-family home, but it nonetheless is allowed within the zone. See response to comment AO-10a.</td>
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As detailed in EIR Section 4.2, the project would not result in significant impacts related to traffic. As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.
A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

Access to the project is provided on La Jolla Scenic Way, rather than La Jolla Scenic Drive North, to prevent conflicts with driveways serving residences located on La Jolla Scenic Drive North.

The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.
Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.

The EIR provides an accurate description of La Jolla Scenic Drive North, including the number of parking spaces and how often the street is used. Please refer to EIR Section 4.2. With respect to potential loss of on-street parking, the construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

The EIR evaluates cumulative traffic impacts due to other projects in development, including the Venter Institute. The project’s contribution to cumulative impacts was determined to be less than significant for the reasons detailed within EIR Section 4.2.

Please see the response to comment AO-13 above. The City does not agree that the current roadways create an unsafe condition. The narrowing of La Jolla Scenic Drive North by 2 feet is still within City standards and the narrowing will serve to slow drivers on this roadway. The traffic study shows that only 1 percent (2 trips per day) will be added to La Jolla Scenic Drive North by the project. No significant impact is calculated.
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<td>AO-15</td>
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<td>See response to comment AO-13.</td>
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Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for "churches and places of religious assembly." This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being "seats," "pew space," and/or "assembly area." The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a
two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

With respect to the facility allowed use within the proposed location, see response to comment AO-8.

Please see the response to comment AO-16.

The EIR figures have been renumbered in the Recirculated EIR (December 2013). EIR. Please see updated Figure 3-5. There are 27 spaces depicted in this figure.

The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.
### LETTER

AO-19 (cont.)

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

AO-20 See the response to comment AO-16.
The EIR provides an accurate project description (see Executive Summary and Chapter 3) in accordance with the requirements of Section 15124 of the CEQA Guidelines. Chapter 9 of the EIR, Alternatives, describes a reasonable range of alternatives as stated by the commenter. The reasonable range of alternatives includes an alternate project site, evaluated but rejected, in compliance with Section 15126.6(a) of the CEQA Guidelines.

The Recirculated EIR (December 2013) included a map of the Site 675 Alternative (see Figure 9-1).

The ROW vacation is a component of the proposed Phase 1/Phase 2 project and would also occur under the Reduced Project Footprint on Vacant Parcel Alternative. The Existing with Improvements Alternative would not require a ROW vacation. The Site 675 Alternative is at a different location and thus would not entail a ROW vacation. The No Project Alternative would not entail any development, and thus would not entail a ROW vacation.

The discretionary actions required for each alternative would be the same as the proposed Phase 1/Phase 2 project, except for the ROW vacation. See response to comment AO-21c.

The discretionary actions required for each alternative would be the same as the proposed Phase 1/Phase 2 project, except for the ROW vacation. See response to comment AO-21c.

Interior occupancy for each alternative would be as follows: Existing with Improvement Alternative would be approximately 10. Reduced Project would be approximately 160.

### Letter

**S.0 Executive Summary**

**S.1.1 Project Location and Setting**

The draft EIR and associated technical documents posted online include:

- Appendix G - Noise Report Revised: 67 pages
- Appendix C - Biology Letter: 22 pages
- Draft EIR: 369 pages
- Appendix F-2 Historic Review: 35 pages
- Appendix B - Traffic Report: 63 pages
- Appendix I - Hydrology Report: 17 pages
- Appendix D - Geologic Reconnaissance: 15 pages
- Appendix A - NOP Comment Ltr: 178 pages
- Appendix F-1 Cultural Resources Report: 44 pages
- Appendix H Water Quality: 51 pages
- Appendix E - Greenhouse Gas Report: 92 pages
- Public Notice and draft EIR: 369 pages (duplicate?)

The total pages (without duplicate) is 953 pages.

### Response

**AO-21a**

Given the volume of information provided, it is critical to include in the Executive Summary a clear, consistent project description for each Project Alternative. It is difficult to understand the information to compare each Project Alternative. Please provide a summary comparison, for each of the following Project Alternatives:

1. Phase 1/Phase 2 project
2. Existing with Improvements Alternative
3. No Project Alternative
4. Reduced Project Alternative
5. Site 675 Alternative

Please provide:

- a. Project site location and with specific boundaries (with map). I have a general idea of where Site 675, but I am not sure of the specific boundaries?
- b. The Right-of-Way vacation specifics are not described in any detail? What are they for each alternative?
- c. What is the project site with and without the proposed right of way vacation
- d. Is the alternative a viable option if the ROW vacation is denied?
- e. What is being requested for each alternative (i.e., Site Development Permit and/or Public Right-of-Way Vacation)
- f. What is the maximum allowable occupancy for each alternative?

**AO-21b**

AO-21b AO-21c AO-21d AO-21e AO-21f AO-21g
AO-22a  The applicant owns the 0.8-acre vacant parcel. The Cliffridge property is 0.2 acres.

AO-22b  EIR Section 3.4.2.1(i) details the ROW vacation: As shown in Figure 3-16, the total area of the ROW vacation along La Jolla Scenic Drive North would total 0.49 acre (21,278 square feet).

AO-22c  The ROW vacation is a part of the proposed project and would be approved or denied as such. Without the ROW vacation, the proposed project as currently designed could not be approved.

AO-22d  See response to comment AO-10a.

AO23a  The Final EIR has been revised to include all information relevant to the Existing with Improvements Alternative to be placed together within Chapter 9.0. Final EIR Figure 9-1 shows the site plan for the Existing with Improvements Alternative, including the site and the boundaries.

Please see the response to comment AO-10. The Existing with Improvements Alternative is adequately detailed in Chapter 9.0 of the EIR. The mechanism to enforce the level of activity and attendance numbers is through the conditions of approval of the Site Development Permit.

AO-23b  The Existing with Improvements Alternative contains the property at 8976 Cliffridge Avenue, including the existing single-family residence.

AO-23c  As discussed in EIR Section 3.3.2, the Existing with Improvements Alternative would require a Site Development Permit for development within the LJSPD, for proposed driveway and parking improvements, and a deviation from parking requirements. No deviation from the Maximum Paving and Hardscape in Residential Zones Requirement would be required.

AO-23d  The Existing with Improvements Alternative is an allowable use in the LJSPDO. See also response to comment AO-8.

AO-23e  The Existing with Improvements Alternative does not require a ROW vacation.
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<td>AO-23f</td>
<td>The maximum occupancy in the Cliffridge house is 13 occupants.</td>
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<td>AO-24a</td>
<td>The No Project Alternative is the description of what would occur if the project were not to be approved. For details relating to this alternative, see EIR Section 9.2.2. The No Project Alternative represents the existing condition, with no development occurring; therefore, no ROW vacation would occur.</td>
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| AO-24b | The City’s Code Enforcement Department issued a violation to the applicant under 2001 Edition CBC Section 3405 stating: No change shall be made in the character of occupancies or use of any building which would place the building in a different division of the same group of occupancy or in a different group of occupancies, unless such building is made to comply with the requirements of this code for such division or group of occupancy.  

The pending code violation therefore relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support that use. The issue is intended to be resolved in connection with approval of the proposed project.  

With respect to whether the approved project would be allowed at this location, see response to comment AO-8. |
| AO-24c | The City’s Neighborhood Code Compliance Department issued a violation to the applicant under 2001 Edition CBC Section 3405 stating: No change shall be made in the character of occupancies or use of any building which would place the building in a different division of the same group of occupancy or in a different group of occupancies, unless such building is made to comply with the requirements of this code for such division or group of occupancy.  

The pending code violation therefore relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support that use. |
**LETTER**

| AO-24d | Potential environmental impacts associated with the project and all alternatives are adequately analyzed within the EIR. The City complied with all noticing regulations pursuant to the City Municipal Code and CEQA. |
| AO-25 | The Cliffridge property is being used by the applicant with the permission of the property owner. If the proposed project is denied, the scenario under the No Project Alternative would occur. See responses to comment AO-24a through AO-24d. |
| AO-26a | Note that this alternative was updated in the Recirculated EIR (December 2013) to be titled “Reduced Project Footprint on Vacant Parcel Alternative.” It does still reflect a reduced project alternative pursuant to CEQA. For details of the alternative, see EIR Section 9.2.3. |
| AO-26b | The physical boundaries of the alternative project site are the same as the proposed project. The development footprint for new construction would be reduced approximately 33 percent compared to the proposed project. The total square feet of new construction associated with this alternative would be 4,307 square feet (on the vacant lot). |
| AO-26c | This alternative would continue to use the existing structure located at 8976 Cliffridge Avenue. |
| AO-26d | Like the proposed project, this alternative would include a ROW vacation. |
| AO-26e | As required by CEQA, each alternative compared to the proposed project and determined whether it would represent a feasible alternative to the proposed project with an explanation for why it is rejected by the applicant. This alternative is rejected because the proposed project provides greater space for the programs and features of the facility as anticipated by Hillel. Should the reduced project alternative be selected by the City Counsel, it would be the project and limited by its description and subsequent discretionary permit requirements. Any future expansion would be required to go through development review as dictated by the City Municipal and Building Codes. |

**RESPONSE**

| AO-24d | Pursuant to City Building Code, maximum capacity would be 170 persons. |

**RTC-490**
The Site 675 Alternative is fully detailed and analyzed within EIR Section 9.2.4. The recirculated EIR (December 2013) included a map (Figure 9-1) showing Site 675.

As discussed in EIR Section 9.2.4, Site 675 is located at the intersection of La Jolla Village Drive and Gilman Drive, surrounded by UCSD lands. Site 675 is designated as Roads/Freeways/Transportation by the General Plan given its location near major roadways. The site is zoned for single-family residential, consistent with the northeastern portion of LJSPD Ordinance.

There are no single-family homes within 30 feet of this alternative.

As identified in EIR Section 9.2.4, this Alternative would result in greater impacts to biological resources than Phase 1/Phase 2 due to the relatively undisturbed nature of the vegetation and topography of the site. As this alternative would require more grading and disturbance of pervious surfaces, hydrology impacts would also be greater than Phase 1/Phase 2.

CEQA Guidelines Section 15126.6(a) states:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.
AO-28a (cont.)

Consistent with the CEQA Guideline quoted above, the EIR provides multiple alternatives to the Phase 1/Phase 2 project in compliance with CEQA, including the Existing with Improvements Alternative. The FEIR has been revised to include all relevant information related to this alternative within the alternatives chapter of the document. This will provide clarity to the reader.

Chapter 9 of the EIR, Alternatives, describes a reasonable range of alternatives including an alternate (rejected) project site. The EIR concluded that there would be significant impacts associated with biological resources, noise, and paleontological resources. Therefore, the focus of the alternative selection was to reduce those impacts. The alternatives identified in Chapter 9 are adequate as a reasonable range of alternatives intended to avoid or substantially lessen significant effects of the project. As detailed in Section 9.1 of the EIR, several alternate location options were analyzed for feasibility by MarketPoint when the Notice of Preparation was issued (2010), which in turn constitutes the baseline conditions for the project and alternatives analysis. The alternative site research included vacant lots, leasable facilities, flex space for sale, and shared space within a reasonable walking distance of the UCSD campus or along a UCSD bus line that encircles the university. Three potential locations were examined in this analysis.

The first site is at the corner of Genesee and La Jolla Village Drive. This is a vacant multi-acre site owned by Garden Communities. It is planned for four high-rise residential towers. The owners of the site intend to build on it when the economy improves and, therefore, it is not for sale. There are two other vacant sites, both at Judicial Drive and Executive Drive to the east of Genesee Avenue. One site is being planned for a high-rise hotel or combination condominium/hotel and the other is designated scientific/research. Neither of the sites is appropriate for a Hillel facility because the sites are far too large and are too distant from campus to meet the objectives of the project.

Development on any of the alternative vacant sites would not necessarily reduce the significant and mitigable impacts of the Phase 1/Phase 2 project, nor would these sites meet a majority of the project objectives.
Therefore, the EIR describes a reasonable range of alternatives, as required under CEQA. Alternate locations were considered regardless of the side of the campus the alternative is on.

CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project
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<th>LETTER</th>
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<tr>
<td><strong>AO-29</strong></td>
<td>The proposed project is currently called &quot;the Hillel Center for Jewish Life Project (HCJL).&quot; The project was previously called Hillel Student Center of San Diego, but changed its name due to unexpected confusion as to the facility's association with the college.</td>
</tr>
<tr>
<td><strong>AO-30a</strong></td>
<td>See response to comment AO-21d.</td>
</tr>
<tr>
<td><strong>AO-30b</strong></td>
<td>The size of the ROW vacation would total 0.49 acre (21,278 square feet). The Reduced Project Alternative would have a similar ROW vacation. No other alternatives would include a ROW vacation.</td>
</tr>
<tr>
<td><strong>AO-30c</strong></td>
<td>The lot size of each parcel is as follows: 0.2 acre for the Cliffridge property; and 0.8 acre for the vacant site.</td>
</tr>
<tr>
<td><strong>AO-30d</strong></td>
<td>The Site 675 Alternative is 13,400 square feet. The remainder of the alternatives utilize the same parcel(s) as the proposed project.</td>
</tr>
<tr>
<td><strong>AO-31a</strong></td>
<td>The Cliffridge property is a single-family residence that is currently being used by Hillel to provide for religious programs. The ownership of the property is not relevant to this CEQA analysis. Because this comment does not raise an issue related to the substance or adequacy of the EIR no further response is required.</td>
</tr>
<tr>
<td><strong>AO-31b</strong></td>
<td>No person currently resides in the residence.</td>
</tr>
<tr>
<td><strong>AO-31c</strong></td>
<td>See response to comments AO-24b and AO-24c.</td>
</tr>
<tr>
<td><strong>AO-31d</strong></td>
<td>The Cliffridge Residence currently serves as the Hillel facility as detailed in Chapter 3 of the EIR.</td>
</tr>
<tr>
<td><strong>AO-32</strong></td>
<td>The comments are beyond the scope of the CEQA analysis. This comment raise an issue related to any substantive issues or to the adequacy and/or accuracy of the EIR. No further response is required.</td>
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<td>LETTER</td>
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| **1.0 ENVIRONMENTAL SETTING**
| Page 2-5, 23.1 Landcover
| AO-33 | “The property also contains a portion of La Jolla Scenic Drive North within the western corner of the site, and the sidewalk along the northern perimeter.”
| | • Specifically, what portion of La Jolla Scenic Drive North is included in the project site?
| | • Does the applicant own the “sidewalk along the northern perimeter” or is this being requested in the ROW vacation?
| AO-34 | Page 2-5, 23.1 - “Due to the developed condition of the project site, it does not contain natural habitat and provides minimal wildlife foraging and sheltering opportunities.”
| | • The undeveloped lot is overrun with gophers. Birds of prey are often seen perched on the lamp posts at the site.
| | • Birds of prey are often seen in pairs as this may also be a mating area.
| AO-35 | Page 2-5, 23.2 Topography, “The project site...is bounded by steep, cut slopes on the north and east.”
| | • What are the exact cut slopes to the north and east?
| | • What is the proposed grading for those slopes?
| AO-36a | Page 2-11, 25.1 City General Plan “This strategy encompasses smart growth principles by aiming to preserve remaining open space and natural habitat and redirect development to areas with available urban amenities.”
| | • What is the current zoning of the 0.8-acre vacant lot (APN 344-120-4300)?
| | • Was the 0.8-acre vacant lot ever zoned as “open space”? 
| | • When was the zoning designation changed?
| | • Why was the zoning designation changed?
| | • Has the 0.8-acre vacant lot ever been considered a transition zone between the UCSD campus and the adjacent residential community?
| | • How would developing the vacant lot been consistent with “preserving remaining open space and natural habitat”?
| | • Are there existing “available urban amenities” within 1 mile of the proposed site?
| AO-36b | See response to comment I-6b.
| AO-36c | The commenter is referencing the General Plan’s intention to preserve large undeveloped areas (i.e., Mission Trails Regional Park) by focusing development in urbanized areas (i.e., the project site). The project site, while, undeveloped, is not designated open space (see response to comment AO-36b).
| AO-36d | See response to comment I-6b.

<table>
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<th>RESPONSE</th>
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</table>
| AO-33 | EIR Section 3.3.1.3 provides a complete description of the proposed project site. Specifically, Figures 3-3 and 3-4 show the project site and limits of work.
| | The sidewalk is not included in the ROW vacation.
| AO-34 | A biological survey of the project site was conducted by a qualified biologist and the results are compiled in the Biological Letter Report included as Appendix C-1 of the EIR. As summarized in Section 4.3 of the EIR, no sensitive wildlife species were detected on-site during the survey; however, the project site was noted to contain trees that may support nesting raptors. Impacts to nesting raptors were identified as a significant impact. To mitigate this impact the project includes mitigation measure BIO-1, which restricts the removal of habitat that supports active nests to outside the breeding season for these species (February 1 to September 15) unless additional steps are taken to assure no nesting raptors are present on site.
| AO-35 | The existing slopes were cut by the construction of the road. The slope at La Jolla Scenic Way varies from 3 feet to 12 feet. The slope at La Jolla Village Drive varies from 0 feet to 12 feet.
| | The proposed grading will reduce the slopes to approximately 7 feet at the high point (intersection of La Jolla Scenic Way and La Jolla Village Drive).
| AO-36a | The parcel is zoned as single-family residential.
| AO-36b | See response to comment I-6b.
| AO-36c | The commenter is referencing the General Plan’s intention to preserve large undeveloped areas (i.e., Mission Trails Regional Park) by focusing development in urbanized areas (i.e., the project site). The project site, while, undeveloped, is not designated open space (see response to comment AO-36b).

Furthermore, Site 653 was evaluated for potential incorporation into the City’s Park and Recreation Department’s open space inventory in November 2000. As detailed in a City memo from the Director of the Park and Recreation Department (McLatchy 2000), the parcel did not meet the City’s definition as an open space parcel, as it is...
AO-36c (cont.)
"completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value.

AO-36d The project site is located in an urbanized area near public transportation. One of the stated primary goals of the General Plan is the "City of Villages" strategy, which aims to create "Mixed-use villages located throughout the City and connected by high-quality transit" (General Plan, March 2008, Page LU-7).
AO-37a  Hillel has been operating at this location since April 2003. With respect to whether this use is allowed in this location, see response to comment AO-8.

AO-37b  See response to comment AO-24c.

AO-38  See response to comment AO-8.

AO-39  The project is comparable to a facility which primary purpose is to provide religious services. See response to comment AO-8.

A mixed-use community is generally represented by residential and commercial/retail. These uses are not allowed within this neighborhood.
The objective of the applicant is to develop on a site that it owns. However, the alternatives analysis (see EIR Chapter 9) analyzed alternative sites that are not owned by the project applicant.

The alternative commercial space analysis conducted by MarketPoint included leasable facilities, flex space for sale, and shared space. Although there were several commercial spaces for rent identified, these spaces would not meet four of the six project objectives identified in Section 3.1 of the EIR, including:

- Provide a permanent religious space in a centralized location for Jewish students at UCSD which, because of separation of church and state issues, cannot be built on the UCSD campus, but is located close to UCSD to serve students where they live and attend classes.
- Contribute to the longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses on a property owned and maintained by Hillel of San Diego (Hillel) for use by UCSD students.
- Enhance pedestrian access, orientation, and walkability of the area surrounding the project site.
- Enhance the religious, spiritual, and community-building activities through the design and character of indoor and outdoor spaces.

Because leasing space would not meet a majority of the project objectives, this suggested alternative was determined to be infeasible.

Whether any Hillel facilities are operating under rental agreements is beyond the scope of this environmental study.
<table>
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<th>LETTER</th>
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<tr>
<td>AO-41 (cont.) preferred because of the close proximity to activities on campus. However, as detailed in Section 9.1 of the EIR, alternative locations were analyzed on more than just the south side of UCSD campus. No alternatives were rejected because they were not on the south side of campus.</td>
<td></td>
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</table>
### LETTER

<table>
<thead>
<tr>
<th>AO-42a</th>
<th>Page 3-5: 3.3.1.1 Site Development Permit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>“A SDP is required for development within the LPSD…”</td>
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</table>

- SDMC 1510.0101 clearly states the purpose of the PDO is to protect the distinctive residential character of the La Jolla Shores Area and that development should be controlled so as to enable the area to maintain its “distinctive identity as part of one of the outstanding residential areas of the Pacific Coast.”
- In allowing a 6,500 square foot Student Center is a single-family residential zone consistent with protecting the residential character of the neighborhood?
- A Potential Improvements Option – is allowing a single-family home to be converted for administrative offices an allowed use in a single-family zone?
- Did the local planning groups (e.g., La Jolla Community Planning Association) recommend approving a SDP for this project?
- If not, why not?

<table>
<thead>
<tr>
<th>AO-43a</th>
<th>Page 3-6, 3.3.1.3 - Street Right-of-Way Vacation</th>
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<tbody>
<tr>
<td></td>
<td>“The Phase 1/Phase 2 project proposes to vacate an unimproved portion of the existing La Jolla Scenic Drive North, a public street ROW, which requires approval of a street ROW vacaton and a vacation of an improved standard cul-de-sac, along the west end of the east-west trending La Jolla Scenic Dr North,…”</td>
</tr>
</tbody>
</table>

- It is hard to understand the specifics of the ROW vacation from this description.
- From Figure 3-1, it appears that the ROW vacation includes (1) the cul-de-sac and (2) a portion of the street La Jolla Scenic Dr North and (3) a portion of the open space along La Jolla Scenic Dr North—is that correct?
- What is the square feet of the ROW vacation for the cul de sac?
- What is the square feet of the ROW vacation of the existing street?
- What is the square feet of the ROW vacation of the open space along the street?
- What is the total square feet of the ROW vacation?
- What is the square feet of the Project 1 / Project 2 alternative without the ROW vacation?
- What is the square feet of the Project 1 / Project 2 alternative with the ROW vacation?
- Would the ROW vacation narrow the existing street by 2 feet, from 36 feet to 34 feet?
- If the ROW vacation is NOT approved, is the Phase 1 / Phase 2 alternative still a viable option? If not, why not?

<table>
<thead>
<tr>
<th>AO-44</th>
<th>Page 3-6, “There is currently no sidewalk along the northern side of La Jolla Scenic Drive North.”</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>There is a very well established footpath along the northern edge of La Jolla Scenic Drive North. Would the Phase 1 / Phase 2 Alternative provide for a sidewalk where the existing and often used footpath currently is?</td>
</tr>
</tbody>
</table>

### RESPONSE

<table>
<thead>
<tr>
<th>AO-42a</th>
<th>The project would be consistent with the character of the neighborhood. See response to comment AO-7.</th>
</tr>
</thead>
<tbody>
<tr>
<td>AO-42b</td>
<td>See response to comment AO-8.</td>
</tr>
<tr>
<td>AO-42c</td>
<td>This comment does not raise an issue related to any substantive issues or to the adequacy and/or accuracy of the EIR. No further response is required.</td>
</tr>
<tr>
<td>AO-43a</td>
<td>The ROW vacation would include the cul-de-sac, and a portion of La Jolla Scenic Drive North as well as a small part of the project site.</td>
</tr>
</tbody>
</table>
| AO-43b | The size of the ROW vacation would total 0.49 acre (21,278 square feet), as follows:  
- cul-de-sac: 6,209 square feet  
- street: 15,069 square feet  
- parcel: 0.49 acres (21,278 square feet) |
| AO-43c | See response to comment AO-21d. |
| AO-43d | This is a correct statement. |
| AO-43e | See response to comment AO-22c. |
| AO-44 | The proposed ROW dedication along the northern perimeter of the project site would include a new sidewalk in the approximate location as the existing. |
AO-45a  Figure 9-1 details the Existing with Improvements Alternative site plan. This alternative would involve paving a portion of the project site for parking. No deviation related to hardscape is required under this alternative. The Final EIR has been revised to removal reference to this deviation. Speculating about future sale of the Cliffridge property is beyond the scope of this environmental review.

AO-45b  As stated in Final EIR Section 9.2.1, a SDP for development within the LJSPD would be required for the Existing with Improvements Alternative.

AO-45c  See response to comment AO-8.

AO-45d  This comment does not raise any issues relating to the substance or adequacy of the EIR. No further response is required.

AO-45e  See response to comment AO-7.
**LETTER**

3.4 PROJECT FEATURES

3.4.1.1 Phase 1/Phase 2

Page 3-8, “The site plan for Phase 2 is shown in Figure 3-4. Phase 2 would consist of the construction of three individual structures with an overall building square footage of approximately 6,500 square feet, situated around a central outdoor courtyard.”

- This is a very limited description?
- It is very difficult to view/read Figure 3-4 and as such a more detailed description would be helpful.
- Figure 3-4 says “?? New Site Wall. Refer to Civil drawings for top and bottom of wall elevations” what does this mean? For example, what would be the visual effects to the single-family homes directly across the street on La Jolla Scenic Dr north? Is there a “reversing wall” how long is it? How high is it? How far is the wall set-back from the street? Is this wall, set-back consistent with the single-family homes across the street?
- What are the dimensions of the “trash and recycling enclosure”? It is located on the southeast corner — will it block the view so people can drive/turm safely in/out of the site?
- 18. Proposed double-yellow street striping centered in street. Refer to General Note below. Where is the General Note below? Where exactly is the proposed double-yellow street striping?
- 2 – Existing stop sign to be removed. Why is this stop sign being removed? This would create a TRAFFIC HAZARD given the acute turn at this corner. If cars are not required to stop at this corner, will be able to see and stop in time if the residents at 8975 Cliffridge or 8976 La Jolla Scenic Dr N are backing out of their garages?

From Figure 3-4 — there appear to be many changes that are not described in detail in the dEIR. As Figure 3-4 is very difficult to read — please describe in the document any changes to the current environment?

- Are there missing pages/figures?
  - Page 3-8
  - Figure 3-2 (page 3-9)
  - Figure 3-3 (page 3-10)
  - Missing Page or Figure??
  - Page 3-12 (blank)
  - Figure 3-4 (page 3-13)
  - Missing Page or Figure??
  - Page 3-15

**RESPONSE**

AO-46 The recirculated EIR (December 2013) included a detailed description of the development summary of the proposed project (see Sections 3.4.1.1 and 3.4.2.1 of the EIR). The figures in the EIR provide additional and sufficient information for the general public and decision makers to make an informed decision regarding the aesthetic and footprint of the project.

AO-47 Please refer to EIR Section 3.4.2.1(g), updated in the recirculated EIR (December 2013), which details the proposed walls and enclosures associated with the project. The walls would be at least four feet in order to screen parking areas, but would not exceed a height of six feet. The total length of screening walls is 267 feet. The visual impacts were also analyzed in EIR Section 4.12.

With regards to setbacks, the project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

Motorists exiting the site would only be allowed to make a right-hand turn onto La Jolla Scenic Way, and thus would be looking north for drivers coming south onto this roadway. The trash and recycling enclosure would be approximately 10’ x 16’ by 10’ high, set back from the curb by 10’ and is located on the southeast corner. It will not block the view of motorist entering or leaving the site.

AO-48 The figure is a reproduction of a site plan done at engineering scale (i.e., 42 inches by 30 inches) that was required to be scaled down. The “general notes” were accidentally cropped off the figure. The “general note” in this reference read: “City of San Diego to verify all proposed street striping and street signage locations along La Jolla Scenic Drive North and Cliffridge Avenue, prior to the issuance of a building permit.” This is also stated in EIR Section 4.2.
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<th>LETTER</th>
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<tr>
<td>AO-49</td>
<td>Please see EIR Section 4.2.5 for potential impacts related to traffic hazards. The reconfiguration of the street as a curve, not an acute turn, would result in less conflict between drivers stopping at stop signs. The volumes on this roadway are not relatively low and this would not change with the addition of the project traffic. Drivers are required to enter and exit their driveways safely.</td>
</tr>
<tr>
<td>AO-50</td>
<td>The recirculated EIR (December 2013) did not identify any new or different impacts to the environment compared to the previously circulated EIR.</td>
</tr>
<tr>
<td>AO-51</td>
<td>The recirculated EIR (December 2013) includes some pages that are blank that serve as placeholders after oversize figures. These pages state: “This Page is Intentionally Blank.”</td>
</tr>
</tbody>
</table>
RTC-504

AO-52 As discussed in EIR Section 3.4.2.1(a), Hillel’s regular hours of operation would be between Monday through Friday, 9:00 a.m. to 10:00 p.m., but generally the facility would only be open during the evenings and on weekends if there is an activity planned at such times. Most activities would not occur during the typical AM and PM peak hours (i.e., 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.).

With respect to the project conforming with the neighborhood character, see response to comment AO-7.

AO-53 See response to comment AO-10a.

AO-54 The total daily trips of a single-family residence is not relevant in this instance. The EIR accurately details the projected trips and potential impacts (see Section 4.2).

The project would be limited to the conditions of approval specifically addressing occupancy restrictions. A Conditional Use Permit is not required. See response to comment AO-10a.
The project would consist of the construction of three individual structures around a central outdoor courtyard providing 6,479 square feet of GFA.

The details of the building are as follows:
- Restrooms: The women's restroom would be approximately 225 square feet and would include 3 sinks, 3 toilets, and a shower. The men's restroom would be approximately 215 square feet and would include 3 sinks, 2 toilets, 1 urinal, and a shower.
- Kitchen: The kitchen would be approximately 300 square feet. The kitchen would include an 8-burner stove and one refrigerator and one freezer.

Most residential kitchens are approximately 10' x 20'. This kitchen would be used for religious purposes to prepare traditional meals during religious holidays.

With respect to noise, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m., and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. While additional visitors could be located within structures, the on-site noise sources anticipated from the project site would include activities at the courtyard and patios. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices within these exterior areas, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.
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| | AO-57 (cont.)
| | With respect to the Existing with Improvements Alternative, Hillel would permanently use the existing Cliffridge. The Noise Report prepared for the project (EIR Appendix G) based the evaluation of this alternative on a maximum of 50 speaking voices. EIR Section 9.2.1 concludes that noise related to on-site uses for the Existing with Improvements Alternative would be consistent with existing measured noise levels, and therefore would not be significant when compared to existing and future traffic noise levels.
| | Sections 4.8.3.1 and 4.8.3.2 have been revised to include a brief discussion of potential noise impacts associated with anticipated special events at the Hillel facility that could attract more than the general daily average amount of visitors. It was determined that impacts would be less than significant.
| | AO-58 This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
AO-59  
P. Parking, page 3-20 “There are specific parking regulations for the proposed use of Phase 2 of the HCL in the City’s Municipal Code, therefore a site-specific parking study and analysis was completed for the HCL. A total of 27 spaces are proposed…”

- INCORRECT: SDMC 142.0530 (c) sets the parking standards for churches or places of religious assembly at 1 per 3 seats, or 1 per 60 in house or pew space or 30 per 1,000 square feet. If Hillel is to be considered a permanent religious structure used primarily for religious purposes then the appropriate standard is 30 spaces / 1,000 square feet or 195 spaces.
- If Hillel is not to be considered a permanent religious structure used primarily for religious purposes, then it is not allowed in the single family zone.
- Where in the SDMC does it allow for a “site-specific parking study and analysis” to determine required parking?
- Figure 3-8 is difficult to view details. The north parking lot appears to have 8 spaces (including 2 handicap spaces). The mid-lot appears to have 10 parking spaces. And the south parking lot appears to have 8 spaces. This only adds to 26 parking spaces. Where is the 27th space?

AO-60  
Please see the response to comment AO-18.

AO-61  
See response to comment AO-19.

AO-62  
As detailed in Section 3.4.2.1(f) of the EIR, landscaping would be provided around the perimeter of the vacant site, including the street yards along La Jolla Scenic Drive North, La Jolla Scenic Way, La Jolla Village Drive, and Torrey Pines Road. The total area within the street yard along La Jolla Scenic Drive North, La Jolla Scenic Way, La Jolla Village Drive, and Torrey Pines Road equals 25,644 square feet, and is proposed to contain a planting area of 14,987 square feet (of Torrey pines and other native trees and shrubs).

If the ROW vacation is denied, no additional landscaping would be provided. See response to comment AO-22c.

AO-63  
The recirculated EIR (December 2013) was updated to provide greater details regarding the walls and enclosures. As discussed in Section 3.4.2.1, retaining walls would be located primarily along La Jolla Scenic Way (eastern portion of the property to screen the parking area) and La Jolla Village Drive (northern portion of property as berm and screening walls). The walls would be at least four feet in order to screen parking areas, but would not exceed a height of six feet. The total length of screening walls is 267 feet.
### LETTER

**AO-64** Page 3-45 “Phase 2 vehicular access to the vacant site would be taken from the new parking area entry at La Jolla Scenic Way... For adequate site distance, 25 feet of curb would be painted red just north of the proposed driveway on La Jolla Scenic Way.”

- The description does not provide the reader with an accurate view of how traffic flows at the site location.
- From La Jolla Village Dr turning onto La Jolla Scenic Way... are there one or two left turn lanes?
- La Jolla Scenic Way goes from two-lanes to one-lane after how many feet from the intersection?
- There is a right-only, no-degree turn on La Jolla Scenic Way onto La Jolla Scenic Drive North... how many feet from the intersection?
- The project entry on La Jolla Scenic Way would be how many feet from the intersection at La Jolla Village Dr?
- Is there a risk of cars backing up in the intersection as cars slow to enter the facility?
- Will this be a right-in/ right-out only entry?
- How many on-street parking spaces will be lost due to red curbing?
- Isn’t La Jolla Scenic Way an unusually heavily trafficked street used by:
  - Neighborhood Residents
  - Parents whose children attend Torrey Pines Elementary School
  - People going to use the La Jolla YMCA
  - People going to the two synagogues on La Jolla Scenic Dr North
  - Students and theatre-goers looking for parking
  - La Jolla Shores residents who cut-through the neighborhood to avoid the signal at Torrey Pines Road

**AO-65** As shown on Figure 3-1 of the traffic study, there are two westbound left-turn lanes on La Jolla Village Drive at La Jolla Scenic Way. The lane drop from two lanes to one lane on La Jolla Scenic Way happens over about 580 feet. The La Jolla Scenic Way / La Jolla Scenic Drive North intersection is located about 200 feet south of the La Jolla Village Drive / La Jolla Scenic Way intersection.

**AO-66** Please see the response to comment AO-12. The driveway would only be accessible via a right turn, and vehicles would be required to exit via a right turn.

With respect to loss of parking, see response to comment AO-19.

**AO-67** La Jolla Scenic Way may be used by a wide variety of commuters. The existing, near-term, and cumulative average daily traffic (ADT) volumes on La Jolla Scenic Way are discussed throughout EIR Section 4.2.

**AO-68** Access to the project is provided on La Jolla Scenic Way, rather than La Jolla Scenic Drive North, to prevent conflicts with driveways serving residences located on La Jolla Scenic Drive North.

The driveway would be relocated during Phase 1 of the Phase 1/Phase 2 project. Please refer to EIR Figure 3-7.
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<th>LETTER</th>
<th>RESPONSE</th>
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<tbody>
<tr>
<td>AO-69a</td>
<td>The curve at Cliffridge Avenue will be designed consistent with City standards. The City would decide if a curve sign should also be installed on Cliffridge Avenue. Since the “intersection” would only be a curve in the road, a stop sign would not be warranted and would be confusing to drivers.</td>
</tr>
<tr>
<td>AO-69b</td>
<td>The turn angle is approximately 75 degrees. Stop signs at locations with very small traffic volumes, such as the subject location are often ignored by drivers and give pedestrians and cross traffic a false sense of security that vehicles will obey the sign. If the residences wished the stop sign to remain, the City of San Diego would consider that request.</td>
</tr>
<tr>
<td>AO-69c</td>
<td>See response to comment AO-69a.</td>
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<tr>
<td>AO-69d</td>
<td>Drivers that mistakenly enter La Jolla Scenic Way will be allowed to turn around at the curve.</td>
</tr>
<tr>
<td>AO-70</td>
<td>As discussed in EIR Section 4.2.5.1(a), La Jolla Scenic Drive North is currently 36 feet from curb to curb. As correctly stated by the commenter, the ROW vacation would reduce the width of the road by 2 feet. The outcome would be a 32-foot-wide roadway which would still be within the standard for a Local Street. See response to comment AO-13.</td>
</tr>
<tr>
<td>AO-71</td>
<td>Please see response to comment AO-70.</td>
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The corners and radius would also conform to City standards.
Section 3.4.2.1(i) of the recirculated EIR (December 2013) was updated to clarify that the project would also dedicate a 2,183-square-foot area along the northern property frontage along La Jolla Scenic Drive to the public ROW. Figure 3-17 shows the proposed ROW dedication along the northern perimeter of the project site. The existing right-of-way along the property measures approximately 0.2 acre.

A bus stop is located on the south side of La Jolla Village Drive adjacent to the project site (that is proposed to remain).
### LETTER

**AO-74**

Page 3-49, “In 1999, at the request of [Hillel, the City issued a request for proposals for potential sale of the 0.8-acre vacant site historically referred to as Site 653. In 2008, Hillel responded to the request and was awarded exclusive negotiating rights to purchase the site after a public hearing.”

- What are the specific boundaries of the 0.8-acre vacant site? Does it include the land being for which a public ROW is being requested?
- Was Site 653 even designated as Open Space?
- If so, when was the designation changed?
- If so, what prompted the designation change?

**AO-75**

Page 3-49, “In 2003, Hillel established its present location at 8976 Cliffsidge Avenue – when the Cliffsidge property was acquired by a private nonprofit foundation that supported Hillel. The property was renovated and provided to Hillel on a rent-free basis. Operations at this location allowed Hillel to pursue its religious purposes and mission while development of a permanent space was considered.”

- Hillel has been using a single-family residences for “administrative offices and one-on-one counseling and meetings with students” (see page 3-1) in violation of the municipal code since 2003 – for over 10 years?
- Does Hillel OWN the single-family house at 8976 Cliffsidge Avenue or does the private nonprofit foundation still own the home?
- If Hillel does NOT own the property, how is it part of any of the proposed alternatives – Phase 1/ Phase 2? Existing with Improvements? No project alternative?
- Is the foundation going to sell the single-family residence at 8976 Cliffsidge Ave to Hillel?
- Is the single-family residence at 8976 Cliffsidge Ave being used primarily for religious purposes or for “administrative offices and one-on-one counseling and meetings with students”?

**AO-76**

Page 3-50, “By designing three smaller, individual structures (two one-story buildings and one two-story building), Phase 1/Phase 2 would more closely relate in scale to the adjacent single-family residences along La Jolla Scenic Drive North and Cliffsidge Avenue.”

- These three individual structures are clustered together around a central courtyard and appear to be one, large 6,500 square foot building which does not in any way relate in scale to the adjacent single-family residences which are approximately 2,200 square feet in the middle of 10,000 square feet lots.

### RESPONSE

**AO-74**

The 0.8-acre vacant lot (344-120-4300) includes Site 653 and the vacated ROW. With respect to the designation of Open Space, see response to comment AO-36b.

**AO-75**

This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.

**AO-76**

Please see EIR Section 4.12.3.1(a) for the analysis of the project’s bulk and scale compatibility with the surrounding land uses. As stated therein, the project would be compatible with the neighborhood character. See response to comment AO-7.
The description of the project site was updated in the recirculated EIR (December 2013) and is correctly described as containing the Cliffridge property, which is being used by the applicant primarily for religious purposes. The ownership of the project site is not relevant for CEQA purposes.

The City's Code Enforcement Department issued a violation to the applicant under 2001 Edition CBC Section 3405 stating: No change shall be made in the character of occupancies or use of any building which would place the building in a different division of the same group of occupancy or in a different group of occupancies, unless such building is made to comply with the requirements of this code for such division or group of occupancy.

The pending code violation therefore relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support that use. The issue is intended to be resolved in connection with approval of the proposed project.

It is assumed that the commenter is referring to the Venter Institute. The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project. See also response to comment AO-4.

Please see the response to comment AO-36b.

The No Project Alternative would not result in the loss of on-street parking, nor would the Site 675 Alternative. The Reduced Project Footprint on Vacant Parcel Alternative would result in the same number of spaces removed as the Phase 1/Phase 2 project. See response to comment AO-19.
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<tr>
<td>AO-81</td>
<td>Please see responses to comments AO-8 and AO-9a.</td>
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<td>AO-82</td>
<td>With respect to project findings associated with the ROW vacation, see response to comment AO-3.</td>
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<tr>
<td>AO-83</td>
<td>See response to comment AO-45a.</td>
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Traffic counts were done on one day in February (February 25). One day of traffic counts is the standard of practice for collecting traffic data. The intersection counts were conducted on a Thursday.

The baseline for existing conditions for a project under CEQA is when the NOP was issued. The NOP for the project was issued in 2010. Thus, traffic counts were conducted in 2010. The traffic study and EIR also evaluated near-term plus project, which added cumulative traffic to the roadways within the traffic model for year 2015. Impacts were found to be less than significant. Please see EIR Section 4.2.3.

The La Jolla Country Day and Montessori Schools were in session when the traffic counts were conducted.

EIR Table 4.2-1 shows the existing conditions at the time the baseline was established (i.e., when the NOP was issued in compliance with CEQA). That year was 2010. Tables presented later on in this section adequately detail the “future” traffic volumes that include planned development projects, such as the Venter Institute. See, for example, Table 4.2-8 within EIR Section 4.2.

Furthermore, the UCSD Long-Range Development Plan (2004) includes a development “allowance” on each site, which is in turn used to project potential future traffic volumes. Those volumes are included in the SANDAG traffic model, which was used in the traffic impact analysis for the project (again, please refer to Table 4.2-8 as an example). Therefore, the maximum development potential of that and other UCSD properties were included in the cumulative traffic analysis.

As shown in each table within this section, the footnote states: “Shading represents highest project traffic during the peak hours of 7-9 AM and 4-6 PM.”

It is not clear what the commenter is specifically referring to to the last comment. The EIR states: “Table 4.2-2 shows the existing study area intersections LOS for the a.m. and p.m. peak hours.” By using the peak hours, the intersections are therefore analyzed in the “worst-case scenario.”

The EIR is correct in stating that there is no sidewalk on the north side of La Jolla Scenic Drive North; however, there is an unimproved dirt footpath.
AO-88 Please see the response to comment AO-11.

AO-89a La Jolla Scenic Way is 261 feet away from La Jolla Village Drive south to La Jolla Scenic Drive North.

AO-89b The proposed driveway is located about 150 feet from the La Jolla Village Drive / La Jolla Scenic Way intersection.

AO-89c The lanes described by the commenter become one lane approximately 650 feet south of the intersection. Adequate sight distance is observed at the project driveway. The driveway would be located approximately 150 feet south of the signalized La Jolla Village Drive/La Jolla Scenic Way intersection, which is visible from the proposed driveway location.

AO-89d As shown in EIR Table 4.2-4, the project is estimated to generate approximately 58 daily trips with an AM peak hour of seven vehicles and a PM peak hour of eight vehicles. This relatively low number of peak hour trips would not likely occur at the same time, from the same location. The commenter’s suggestion that cars could “back up into the intersection” is speculation. See also response to comment AO-89c.

AO-89e See response to comment AO-19.

AO-89f Access to the project is provided on La Jolla Scenic Way, rather than La Jolla Scenic Drive North, to prevent conflicts with driveways serving residences located on La Jolla Scenic Drive North.

AO-90a There is a raised median on this portion of La Jolla Scenic Drive North that would prevent a left turn exiting from the facility.

AO-90b With respect to the adequacy of sight distance, see responses to comments AO-12 and AO-13.

AO-90c While it is possible for drivers to choose to make that maneuver, it is more probable that driveways would remain on southbound La Jolla Scenic Drive North and make the U-turn at the first intersection at Caminito Deseo.

The total site trip generation is only 58 ADT. Even if 10 percent of the total traffic utilized Cliffridge Avenue, a much higher percentage than predicted in the traffic study, only six trips per day would be added to Cliffridge Avenue, less than the day to day fluctuation on the road.
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With respect to the safety of U-turns, EIR Section 4.2.5.1(a) states the following:

Outbound traffic oriented to La Jolla Village Drive would make a southbound to northbound U-turn at the intersection of La Jolla Scenic Drive North and Caminito Deseo. A field observation of the available turning radius at Caminito Deseo was compared to the required minimum design internal turning radius of 36 feet. Based on the field visit under existing roadway conditions, it was observed that 40 feet of internal turning radius is available. Therefore, a U-turn is feasible at this intersection. Although a U-turn is feasible, additional traffic measures would be required to prevent potential conflict between U-turning vehicles and vehicles making a westbound to northbound right turn from Caminito Deseo.
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|        | **AO-96 (cont.)**  
Deseo onto La Jolla Scenic Drive. The traffic study recommends the installation of a stop sign on Caminito Deseo approaching La Jolla Scenic Drive.  
Therefore, potential traffic safety concerns noted by the commenter related to U-turns were found to be less than significant, as detailed in EIR Section 4.2. A maximum of seven vehicles are expected to perform the U-turn during the PM peak hour.  
**AO-97** The Parking Impact Overlay Zone requires a project to provide adequate parking off-site. See response to comment AO-19. |
LETTER

AO-98

Appendix B. Traffic Impact Analysis, page 54

“...It should be noted that while the UCLA facility is most closely representative of the proposed UCSD site, it is much larger in terms of square footage. Even with the significant increase in size for this center which would allow for a higher attendance at programmed events, parking is apparently a non-issue both for the facility patrons and with the surrounding community residents.”

- UCLA Hillel is not similar to this proposed site:
  - It is located in a multiple dwelling zone, not a single-family zone
  - As stated on their website (http://ucla.hillel.org/home.aspx)
  - Parking for Hillel at UCLA is located at UCLA’s Lot 2, just south of Hillel on the opposite side of the street. “PLEASE NOTE THAT THERE IS NO PARKING AVAILABLE AT HILLEL OR ON THE SURROUNDING NEIGHBORHOOD STREETS”
  - At the UCSD location – there is no huge pay for parking lot available to the students. As such, this is not a valid comparison.
  - Hillel UCSD is located in a high-density, student residential zone with large parking lots on either side of the student center.

AO-99

Page 55, “Table 15-1, the average parking rate for the similar California University Hillel centers is 1.9 provided spaces per KSF...”

- These parking ratios are cherry-picked
- UCLA should not be included per reasons stated above
- UCSB is located in what type of zone? Is there a CUP? What is the parking availability other than at the Hillel site?
- CSUN is located in what type of zone? Is there a CUP?
- CSUN provides 40 on-site spaces (not 17) – if Hillel visitors can park in the 40 spaces, then they should all be included in the calculation
- The source of this data is the “Project Applicant” – it appears that the applicant has selectively picked with Hillel sites to include in the Parking Rate Summary to get the appropriate average. Did the Traffic Engineer conduct an independent analysis?
- What are the data points for UC Berkeley? UC Santa Cruz? UC Irvine? UC Riverside? And UC Davis?
- The parking study should not only count vehicles parking in the parking lot of the facility, but should also take into account nearby parking lots, streets for vehicles that are utilizing the facility.

RESPONSE

AO-98

See responses to comment AO-16.

AO-99

See response to comment AO-16.
AO-100a With respect to impacts associated with on-site noise, see response to comment AO-57. Occupancy would be limited for the entirety of the facility (indoor and outdoor). See response to comment AO-10a. Additional issues related to noise impacts with respect to the project’s noise compatibility, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m. and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.

In addition, any visitor to the site would be leaving from the parking lot or to the north back towards campus, not in the identified neighborhood.

AO-100b Car alarms and beeping are not continuous noise sources and would have little to no effect on hourly ambient noise levels. The unnecessary use or operation of horns, signaling devices, or other similar devices, on automobiles, motorcycles, or any other vehicle is regulated by the City of San Diego Municipal Code Chapter 5, Art 9.5, Div 5, Public Nuisance Noise. Car alarms would not result in a significant noise impact.

AO-100c Vehicles entering the project site would do so from La Jolla Scenic Way, and would be entering at very low speeds. The noise due to the relatively low number of trips entering and exiting the site would not be audible in relation to the existing ambient traffic noise along heavily traveled roadways adjacent to the site (such as La Jolla Village Drive).
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<th>LETTER</th>
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<tbody>
<tr>
<td>AO-100d</td>
<td>The project would have no effect on what may or may not be occurring due to the La Jolla Playhouse.</td>
</tr>
<tr>
<td>AO-101a</td>
<td>EIR Section 4.12 determined that potential visual impacts would be less than significant for the reasons detailed therein. With respect to setbacks, see response to comment AO-47.</td>
</tr>
<tr>
<td>AO-101b</td>
<td>The setback of the project would be 10 feet with the narrowing of La Jolla Scenic Drive North, which would provide additional landscaping and pathways.</td>
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<tr>
<td>AO=101c</td>
<td>Retaining/screening walls and planting would be required and are shown in Figure 3-4. These would be located primarily along La Jolla Scenic Way (eastern portion of the property to screen the parking area) and La Jolla Village Drive (northern portion of property as berm and screening walls). The walls would be at least four feet high in order to screen parking areas, but would not exceed a height of six feet. The total length of screening walls is 267 feet.</td>
</tr>
<tr>
<td>AO-101d</td>
<td>Views from private residences are not required to be analyzed under CEQA. As determined in EIR Section 4.12, however, the project would have a less than significant impact with regards to bulk and scale compatibility. See response to comment AO-7.</td>
</tr>
</tbody>
</table>
AO-102a  EIR Section 4.12.3 analyzes the project’s development features and potential impacts, which were determined to be less than significant for the reasons detailed therein. The project design would be compatible with the neighborhood character. See response to comment AO-7.

The project’s buildings are clustered around a central courtyard in the southeastern portion of the site in order to be compatible with the bulk and scale of surrounding uses. This also allows extensive landscaping and pedestrian pathways to surround the project site (see EIR Figure 3-10).

AO-102b  The project site would be 33,541 square feet. See response to comment AO-21d for a breakdown of lot size with and without the ROW vacation.

The size of the parking area is approximately 8,700 square feet.

AO-102c  The lot size is detailed above in response to comment AO-102b. The three buildings comprise 7,084 square feet.

AO-102d  See response to comment AO-102a.

AO-102e  See response to comment AO-8.

AO-103  The EIR evaluated and determined that there would be no significant impacts with regards to Land Use (Section 4.1), Transportation, Circulation, Parking (Section 4.2), or Visual Effects and Neighborhood Character (Section 4.12), for the reasons detailed within each section, respectively.
The EIR evaluated each issue area identified by the commenter and determined that there would be no significant impacts with regards to Transportation, Circulation, Parking (Section 4.2), for the reasons detailed within that section. Adequate parking would be provided on-site to accommodate the day-to-day operations of the facility. A parking management plan has been developed to accommodate occasional special events. The project generates only 58 average daily trips and was determined to have no significant impacts.
Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose "...is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

The project represents a religious use which, like other churches, temples, and places of worship, would inherently include some accessory uses, which are considered part of the primary use. As detailed in Section 3.4.2 of the EIR, the proposed project would include multiple component parts which support the primary use of project (see response to comment I-1). Besides the library/chapel, religious activities would take place in the lounge and meeting rooms, as well as the outdoor courtyard space. The kitchen would be used to prepare traditional meals during religious holidays. Bathrooms are necessary for religious staff members and visitors. A shower is necessary to encourage bicycling to the site and a commonplace within facilities of this nature.

As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits.
Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.
Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

With respect to the provision of parking based on the square feet of the proposed structure, see response to comment I-3 for a discussion of the allowable occupancy of the facility. As described above, the project is providing adequate parking for its intended use.
<table>
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<tr>
<th>LETTER</th>
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<tr>
<td>AQ-5</td>
<td>Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function. While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.</td>
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</tbody>
</table>
While there is a potential for other UCSD student religious organizations to seek off-campus facilities in the project area, the constraints of finding a suitable site would be a limiting factor. The area in which the project is proposed is mostly developed, with UCSD and Scripps in close proximity to the project area as well as existing residential uses. Although there are small pockets of undeveloped land nearby, future development in this area is largely constrained by existing development, allowed uses, permitting and environmental review requirements, and the cost of acquiring land. Therefore, development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Translating these remarks: the precedent is indeed set. Approval of the HCJI project (formerly known as Hillel of San Diego Student Center II) means that any UCSD student religiously-affiliated organization with enough money to buy several adjacent (already developed) lots will be freed by the HCJI precedent to install its own student center in the single-family neighborhood. The single-family area can become a neighborhood of religiously affiliated student organizations and their administrative offices.

**Omission 1, Right of Way Vacation:** The DEIR notes that a right of way vacation on the 8900 block of La Jolla Scenic Dr. will be required to undertake the project, but it does not investigate whether the required right of way vacation is lawful. The municipal code requirements for a right of way vacation are:

(a) There is no present or prospective public use for the public right-of-way, either for the facility for which it was originally acquired or for any other public use of a like nature that can be anticipated;
(b) The public will benefit from the vacation through improved use of the land made available by the vacation;
(c) The vacation does not adversely affect any applicable land use plan; and
(d) The public facility for which the public right-of-way was originally acquired will not be detrimentally affected by the vacation.

All four of the findings must be fulfilled. A full review of the project will demonstrate that none of the findings can validly be made. This reflects in part the distinctive topography of the 8900 block of La Jolla Scenic Dr. The roadway in that area has a peculiar Z-shape configuration including turns of 120° at the east (La Jolla Scenic Way) and west (Ciffridge Ave.). See Appendix 2. This configuration is inherently unsafe due to restricted visibility, a peril that will be exacerbated by the student center traffic. Planned use of the vacated right of way by the proposed project includes narrowing the hard-surface pavement on the 8900 block. Narrowing the roadway makes a street with dangerous blind corners more dangerous still. Hence finding (a) cannot be made.

The vacation facilitates landscape of the property, a public benefit. But there is a serious public cost: loss of on-street parking in a heavily trafficked area. Finding (b) cannot be made.

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**AQ-6a**

The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

**AQ-6b**

The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

**AQ-6c**

With respect to the use of the project site as “open space,” in November 2000, Site 653 was evaluated for potential incorporation into the City’s Park and Recreation Department’s open space inventory. As detailed in a City memo from the Director of the Park and Recreation Department (McLatchy 2000), the parcel did not meet the City’s definition as an open space parcel, as it is “completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value.” See EIR Section 3.6.1.
| AQ-6d | See response to comment AQ-6b. |
| AQ-7  | Please see the response to comment AQ-6b. |
| AQ-8  | See response to comment AQ-1. |
| AQ-9  | There is no such requirement and the commenter does not provide evidence of such requirement. The project site is owned by Hillel. |
| AQ-10 | The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project. Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition. The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections. |
Appendix 1: Hillel of San Diego Description and Mission Statement (from http://ucsdhillel.org/about/ January 26, 2013)

About
Hillel of San Diego, accredited by Hillel: the Foundation for Jewish Campus Life, serves an estimated 5000 Jewish undergraduate and graduate students at institutions of higher education across San Diego County. Students from all backgrounds are invited to participate in Jewish life on campus. Social, cultural, educational, and community service programs provide opportunities for students to build relationships with each other and develop Jewish community.

Hillel of San Diego Mission Statement
To be a vibrant Jewish campus presence and to involve the maximum number of university-age Jews in ways that foster a lasting commitment to Jewish life.

To further this mission, we commit ourselves to the following goals:

- Serving the needs of individual Jewish students
- Creatively engaging and empowering Jewish students through personal interactions and compelling programs
- Building a strong sense of belonging and Jewish identity
- Nurturing intellectual and spiritual growth in a pluralistic community
- Advocating for Jewish student needs on campus and in the community
- Linking the campus community to the larger Jewish community, locally and globally
- Helping students cultivate a closer connection to Israel
- Developing a campus and organizational culture in which the quality of the relationships attracts involvement.
Appendix 2: La Jolla Scenic Dr. with blind intersections at La Jolla Scenic Way and at Cliffridge Ave. --- a traffic hazard with a narrowed street
AR-1 Traffic and safety issues are analyzed in Section 4.2 of the EIR. As discussed therein, the EIR determined that no significant impacts associated with these issues would occur as a result of the project.

AR-1 Dear Project Planners:

I am a resident in the neighborhood in which the Hillel Center is planned. A few months ago I was hit by a car that ran the red light at the corner of U Village Dr. and Tommy Piles Rd. (near the UJ Playhouse). The car was driven by a young man that wasn’t paying attention. I ended up in the hospital with pelvic and coccyx fractures. I was unable to walk for months and was unable to care for my two children. I had to cancel multiple civic/community volunteer commitments. There is already so much traffic and congestion in the area where Hillel plans to build its center that I am afraid for all of us. It is already so unsafe to walk/ride a bike in our neighborhood, that any increased traffic would probably result in pedestrian injury and death. I have young children who can’t even cross our neighborhood street (UJ Bridge) on their own because of speeding drivers and this will just get worse if the Hillel Center is built. In fact, the Hillel uses now on the corner has cars that back in and cut off all the time, and these cars nearly hit people all the time. My neighbors have young children as well, and I have elderly neighbors who are also in danger of injury. Please protect us and do NOT allow the Hillel Center to be built.

Thank you for your time and consideration,

Yanne
Elaine Roberts
Resident, Community Member, Mother
The intention of the EIR is to disclose potential environmental impacts to the public and decision makers. The EIR was made available as a PDF on the City’s website, which would allow the reader to zoom in on graphics. The remainder of the comment is an introduction to the comments that follow. No further response is required.

Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “... is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase I/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase I/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to
the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

EIR Section 4.1.4.1(a) also analyzes the Phase 1/Phase 2 project in relation to the setbacks of other buildings in the vicinity. As shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

As shown in EIR Figure 3-10, the project site would be adequately buffered from the adjacent neighborhood through landscaping features.

The mechanism to enforce the level of activity and attendance numbers is through the conditions of approval of the Site Development Permit.

The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project's consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

With respect to the attendance issue, see response to comment AS-4a.

Potential impacts associated with traffic, noise, and lighting were all analyzed in the EIR and determined to be less than significant.
5) Inadequacy of Parking and Inaccurate Assessment of Potential Parking Traffic Impact:

As noted in item 1 above, the proposed facility is a first and foremost a student center, which is semantically mischaracterized as a place used primarily for religious purposes. A student center, whether or not it is centered on religious activities, is still a student center. However, even if it were primarily a religious building, the LSBPD ordinance and the Municipal Code require that it provide parking space per 3 seats or 30 spaces per 1,000 square feet of assembly area. In the proposed Project, 27 parking spaces are proposed. The total building area in the Project is nearly 7,000 square feet, which would require nearly 200 parking spaces, 8 times as many as planned. It may well be that the preparers of the Project have calculated 27 parking spaces based on an allocation of 984 square feet for the Library/chapel portion of the Project. However, this is only about 15% of the total building area for the Project, meaning that the Project is not intended to be primarily a religious facility or a place of worship but rather a student activity/social center and a large administrative space. Again, this is not permitted according to the LSBPD ordinance.

Second, the parking allocation is based on speculative projections regarding what the attendance will be and what fraction of the attendees will drive to the facility. Section 4.2.3.1 states that “The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated that they would walk to the Hillel facility at its proposed location. Of the 20 percent that suggested they would drive to the facility, approximately 1 percent of those students responded that they would carpool.” There is absolutely no detail presented about how this survey was conducted, whom the survey subjects were and where they lived. The survey did not ask any questions involving alternative sites, other possible means of transportation (shuttle, bus, biking). In other words, this is neither a meaningful nor an independent survey, and has no statistical/scientific factual relevance. Neither attendance nor means of travel or location of parking is enforced. Thus, the statement that the parking and traffic impact will be negligible is purely speculative. Comparisons to Hillel Centers in other UC campuses carry no relevance, as the issues concerning the environmental impact of the UCSD Hillel are very specific to the neighborhood in question. It is important to note that we, as the immediate neighbors, often see employees and attendees of the current Hillel facility at 8975 Cliffbridge Ave., park their cars on Cliffbridge Avenue, rather than the parking spaces of the facility or even La Jolla Scenic Drive North. This is evidence that without enforcement of the same (parking on nearby streets) is likely to happen with the proposed Project.

6) Significant Impact on the Visual Harmony of the Neighborhood: The Project, with a size nearing an acre and building footprint of nearly 7,000 square feet, is significantly larger than any of the bordering residences. It has many sharp lines and no setback from the street which stand in stark contrast to the buildings in the neighborhood. The mention of the large UCSD La
to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

AS-7 See response to comment AS-6.

AS-8 The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3 6, 3-12, and 3-13 of the
EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

Potential impacts associated with the project’s proposed walls are discussed in EIR Section 4.12. The EIR determined that no impacts would occur.
With respect to the proposed narrowing of La Jolla Scenic Drive, the proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a), La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

Note that the pedestrian walkway, open to bicyclists and skateboarders) would be improved from the existing unimproved footpath to a paved sidewalk.

See response to comment AS-9.

The proposed project would not result in vehicle trips through the identified residential neighborhood, as the access to the project site would be taken via La Jolla Scenic Way.

With respect to the proposed narrowing of La Jolla Scenic Drive, see response to comment AS-9.

The Existing with Improvements Alternative involves the permanent use of the Cliffridge property primarily for religious purposes which are allowed within the zone. See response to comment AS-2.

The Final EIR includes an updated analysis for the Existing with Improvements Alternative (see Final EIR Section 9.2.1). No deviation related to paving and hardscape is required under this alternative. The Final EIR has been revised to remove all reference to this deviation.

With respect to the project’s consistency with the neighborhood character, see response to comment AS-8.
The recirculated EIR (December 2013) includes an updated map with the location of the Site 675 Alternative. See Final EIR Figure 9-2.

The EIR identified significant (mitigated) impacts associated with biological resources, noise, and paleontological impacts. The intention of a reduced project alternative is to decrease impacts that have been identified for the proposed project. Visual impacts were determined to be less than significant under the proposed project; therefore, pursuant to CEQA this issue is not required to be discussed under the alternative. The Reduced Project Alternative was updated in the recirculated EIR (December 2013) to be titled “Reduced Project Footprint on Vacant Parcel Alternative” in order to reflect that the intention of the alternative was to reduce potential impacts associated with the project’s proposed construction on the vacant parcel. This alternative reduces the development footprint by removing one building, and reducing another to be one story instead of two. The result of this alternative was the reduction of grading. As discussed in Section 9.2.3, this alternative would reduce impacts associated with paleontological resources compared to the project. A site plan of the alternative is included in Chapter 9 of the EIR.
CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.
Letter AT

March 11, 2013

Dear Ms. Shearer-Nguyen:

Thank you for the opportunity to comment on the EIR for the proposed project. As a software developer and as a writer, I found reading the document to be a confusing and sometimes frustrating experience. Wording often repeats, sometimes verbatim, and passages from governing documents are often presented without proper context or only include a portion of the pertinent provision. Details are sometimes glossed over or omitted—maybe detailed in a later section, but never mentioned in previous sections. Opinions are sometimes presented as facts, while much of the phrasing is framed with an air of authority that, to a law reader, seems to brook little room for question.

I found the following general issues to be particularly frustrating:

- The practice of switching between two development options (Phase 1/Phase 2 and Existing with improvements) presents unnecessary complication in attempting to judge the merits or impacts of a single option. This arrangement is further complicated by the fact that discussion for the Phase 1/Phase 2 option is almost always longer and more complicated than that for the Existing with Modifications option. While this is clearly necessary due to the difference in nature between the two options, it lends itself to reader fatigue and confusion about what is said about which option and where.

- Nowhere in the main document does it clearly and unequivocally state whether the facility is to be for students only or open to the general public. [This information is found only in the Traffic Impact Analysis (Appendix B), itself a subject of frustration (as seen in the next point)]. Nor does the document clearly indicate what effect, if any, the ROW vacation would have on the existing portion of La Jolla Scenic Drive North that is not part of the cul-de-sac. Other details or elements of the project (e.g. hours of operation)
Sometimes appear to be clearly stated, but also include suggestion of possible exceptions which make the accuracy of data difficult to pin down.

- The Traffic Impact Analysis (Appendix B, and freely copied within the main document itself) undermines its credibility by using questionable data analytic practices, ignoring City documents and guidelines, and omitting large, well-known/publicized nearby developments as data points in its analysis. The frustration lies in the fact that since much of the analysis blithely continues to build on suspect data using a potentially flawed methodology, pertinent questions become more irrelevant. I do continue to ask them; however, in no way should the continued comments and questions regarding the Traffic Impact Analysis and relevant sections in the main document be considered acceptance of flawed fundamental assumptions.

- A stubborn, almost willful insistence of mischaracterizing the homes to the east of the site as “multi-family condos.” Such misstatements have been made in every single environmental document draft that has generated for a proposed project at this site. In each, City staff has had concurred that these characterizations are false and corrected them. It is a shame that City staff’s time must continue to be wasted.

In all, the document raised many questions for me. I have included them as numbers under each relevant passage (denoted by Page Number and Paragraph). I have also included observations and corrections, denoted as bullet points. To assist in the processing of my commentary, I have made an effort to eliminate questions that are answered in later sections if those questions seem too detailed for the prior passage, but the repetitive nature of the document appears to have done its best in fouling the best my of intentions (I also, however, purposefully left in place some duplicates where I felt the points raised earlier may still have some bearing). I apologize for those that I have missed.

Sincerely,

Alex Veron
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<th><strong>LETTER</strong></th>
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<tr>
<td><strong>AT-2a</strong> The parcels are not separated by the street. APN 344-120-4300 includes the dedicated ROW; the ROW is not a separate legal parcel.</td>
<td><strong>AT-2b</strong> Guidelines. Specifically, the existing vacant lot upon which the project is proposed is a total of 0.80 acre. The project also includes a ROW vacation which would add an additional 0.49 acre to the project site. Therefore, upon project approval, the total site would be 1.29 acres. See EIR Figures 3-1 (size and location of ROW vacation) and 3-3 (final boundaries of the project site).</td>
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<td><strong>AT-2c</strong> The ownership of the property is not relevant to this CEQA analysis. This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.</td>
<td><strong>AT-2d</strong> Projects under CEQA are allowed to span multiple parcels.</td>
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<td><strong>AT-3</strong> Projects under CEQA are allowed to span multiple parcels.</td>
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<td><strong>AT-5</strong> Non-profit organizations are not entitled to waivers. The project applicant is subject to DIFs and would pay all fees in accordance with the City's schedule of DIFs.</td>
<td><strong>AT-6</strong> The project would be subject to the commercial/industrial development fee and would be required to pay all fees in accordance with the City's schedule of DIFs.</td>
</tr>
<tr>
<td><strong>AT-7</strong> The project site is located within a Very High Fire Hazard Severity Zones and would be subject to all additional building standards required.</td>
<td><strong>AT-7</strong> The project site is located within a Very High Fire Hazard Severity Zones and would be subject to all additional building standards required.</td>
</tr>
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</table>
The comment relating to the findings of the San Diego City Auditor’s report from 2012 does not raise an issue regarding the substance or adequacy of the EIR. No response in required.

The Citygate report evaluated fire response times within the City of San Diego and presented recommendations. The UCSD area was listed as #8 on the priority list of areas within the City that needed a fire station, with the first six being prioritized as the most in need.

The comments relating to officer-to-population ratios of other cities and requesting crime statistics do not raise an issue regarding the substance or adequacy of the EIR. With respect to the conclusions related to the adequacy of police protection, the CEQA evaluation is based on whether a project requires a need for additional public services or facilities which would result in a physical impact (i.e., construction or alteration of facilities). EIR Section 8.4 discusses that the proposed project does not include housing or any other component that would reasonably be expected to generate a population increase. As a result, there would be no corresponding increase in demand for public services or facilities. It was determined that no impact to public services would occur.

DEIR Section 2.4 discuss public utilities. As stated therein, as part of the review process, the City assesses the need for new or expanded services and public facilities in order to provide appropriate service levels commensurate with population increase and new development. To ensure that development does not occur unless facilities and improvements are available to support that development, the CIP program and PFFP review cycle includes a defined public facilities phasing policy to appropriately schedule the timing and location of City improvements.

The Phase 1/Phase 2 project does not include housing or any other component that would reasonably be expected to generate a population increase. As a result, there would be no corresponding increase in demand for public services or facilities. See EIR Section 8.6.

The project site is not currently serviced by “purple pipes.”
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<td>AT-10</td>
<td>The project would be required to attain a waste diversion rate of 75 percent, consistent with the Municipal Code. With respect to construction waste, grading activities would result in the need to export approximately 3,150 cubic yards of soil. As discussed in EIR Chapter 3, prior to grading operations, the general contractor would work with the City’s Environmental Services Department to determine if another site in the vicinity could reuse the soil, or would haul the soil to an appropriate recycling facility. With respect to operational waste, EIR Chapter 3 identifies that to minimize waste during the operational phase, the project would comply with the City Recycling Ordinance and include areas for storage and collection of recyclables and yard waste in conformance with applicable City regulations. As further discussed in EIR Section 8.6 because the project would not generate an increase in population, the project would have no impact relating to solid waste.</td>
</tr>
<tr>
<td>AT-11</td>
<td>The General Plan land use maps provide a broad overview of the designated land uses within the City of San Diego. The La Jolla Community Plan provides a much greater detail of the designated land uses within the distinct parts of the community. The Community Land Use Map (Figure 3 of the La Jolla Community Plan) designates the project site as Low Density Residential.</td>
</tr>
<tr>
<td>AT-12</td>
<td>The acronym was previously spelled out in Chapter 1, Introduction. By convention, the acronym is used in subsequent references and is included in the list of acronyms at the beginning of the EIR.</td>
</tr>
</tbody>
</table>
| AT-13 | This statement is incorrect, as it does not allow “buildings for religious purposes,” but buildings “used primarily for religious purposes as a conditional use subject to a Process Three Conditional Use Permit in accordance with Land Development Code Section 141.0404.”
1. Is this phrase included in the Planning Context sections of any other environmental documents for projects within the LJSPD? Should it be used here?
2. Could such a use in this context be considered prejudicial?

2-14, Paragraph 1. “The City’s MSCP study area includes 206,124 acres within the City’s jurisdiction.”

| AT-14 | The MSCP area covers 206,124 acres within the City’s jurisdiction, including the project site.

| AT-15a | The comment regarding the current use of the property does not raise any issues related to the substance or adequacy of the EIR. However, as described in EIR Section 9.2.2., under the No Project Alternative, existing conditions on the Cliffridge site would be retained.

| AT-15b | The City’s Code Enforcement Department issued a violation to the applicant under 2001 Edition CBC Section 3405 stating: “No change shall be made in the character of occupancies or use of any building which would place the building in a different division of the same group of occupancy or in a different group of occupancies, unless such building is made to comply with the requirements of this code for such division or group of occupancy.”

The pending code violation therefore relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support that use. The issue is intended to be resolved in connection with approval of the proposed project.

| AT-15c | The comment regarding past use of the property does not raise any issue related to the substance or adequacy of the EIR. No response is required.

| AT-15d | The comment regarding past applications does not raise any issue related to the substance or adequacy of the EIR. No response is required.

| AT-15e | The comment regarding the temporary nature of the use does not raise any issue related to the substance or adequacy of the EIR. No response is required.
As detailed in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” The Hillel staff at the Cliffridge property support the religious programs for Hillel, including helping students plan programming for their religious life, developing religious events and trips, and fundraising for the students to do their religious work. Students visit the Cliffridge property for religious meetings and counseling, and to coordinate different aspects of Jewish life on campus. These activities represent a primary religious purpose.

While there is a current code violation relating to modification necessary for the use (see response to comment AT-15b), a Conditional Use Permit would not and has not been required.

The Cliffridge property would revert from being a religious use to a single-family use. A Change of Occupancy/Change of Use is not a discretionary action and therefore not listed as such in the EIR.

“Piecemealing” has been addressed through CEQA case law, which holds that “an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” Reversion to a single-family dwelling unit is not an “expansion” of the proposed project, nor does it trigger the need for further or different environmental review.

There has been no action taken on the Cliffridge property.
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<td>AT-17</td>
<td>The analysis of the Existing with Improvements option has been moved in its entirety to Chapter 9.0 of the Final EIR. Pursuant to CEQA, the decision maker could decide to approve an alternative to the project in lieu of the proposed project.</td>
</tr>
<tr>
<td>AT-18</td>
<td>See response to comment AT-15b.</td>
</tr>
<tr>
<td>AT-19</td>
<td>This comment represents the commenter opinion and does not relate to the substance or adequacy of the EIR. No response is required.</td>
</tr>
<tr>
<td>AT-20</td>
<td>The permitting process is a Process 4 SDP that is utilized for requiring deviations. LEED Silver certified qualifies the project for expedited program which allows an SDP. The inclusion of such features allows the project to make the Supplemental Findings for the SDP which require the project to demonstrate that it would materially assist in reducing impacts associated with fossil fuel energy use by utilizing alternative energy resources, self-generation, and other renewable technologies (e.g., photovoltaic) to generate electricity needed by the building and its occupants (see EIR Section 3.3.1.1). The project would include design features, as stated in EIR Section 3.5 which would meet the City’s Sustainable Building policy and LEED Silver certification criteria. Therefore, these findings would be met.</td>
</tr>
<tr>
<td>AT-21</td>
<td>Please refer to EIR Section 3.6, “History of Project Changes,” which details the previous project history and the changes to the Phase 1/Phase 2 project. The comments related to previous proposals affecting the project site are not related to the substance or adequacy of the EIR. No response is required.</td>
</tr>
<tr>
<td>AT-22</td>
<td>See response to comment AT-17.</td>
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With respect to the project alternatives, CEQA Section 15126.6 requires a discussion of alternatives to the project which are also available to be approved by the approving body.
The recirculated DEIR (December 2013) included additional information regarding the ROW vacation and other easements. As detailed in DEIR Section 3.4.2.1(i), the Phase 1/Phase 2 project proposes a ROW vacation, utility easement reservations/dedications, and a street dedication. EIR Figure 3-16 shows the ROW vacation and reservation of utility easements.

The Phase 1/Phase 2 project includes a request for a deviation from Driveway Curb Cut Requirements, and as updated in the Final EIR, a deviation for a reduction in the number of required parking spaces (see EIR Section 3.3.1).

The project is not subject to the Campus Parking Overlay Zone or Maximum Paving and Hardscape regulations The Existing with Improvements Alternative would not require a deviation from the Maximum Paving and Hardscape in Residential Zones. The Final EIR has been revised to remove reference to this deviation.

The project proposes a single ROW vacation for a portion of La Jolla Scenic Drive North between Torrey Pines Road and La Jolla Scenic Way for the purpose of enhancing the pedestrian environment through construction of sidewalks and landscaping features.

The project also proposes the vacation of the cul-de-sac, located at the west end of La Jolla Scenic Drive North, approximately 100 feet west of Cliffridge Avenue.

The ROW vacation would occur entirely within the Phase 2 site (i.e., a single ownership parcel owned by Hillel, APN 344-120-4300). The vacated ROW would become part of the parcel. Please see DEIR Section 3.4.2.1(i):

Phase 1/Phase 2 proposes to narrow La Jolla Scenic Drive North by 2 feet to provide for a 12-foot Parkway on the north side of the roadway with increased landscaping. La Jolla Scenic Drive North currently measures 36 feet wide from curb to curb. As detailed in Section 4.2.5.1, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards.

The DEIR contains adequate detail to determine the potential impacts of the ROW vacation.
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<tr>
<td>AT-25b</td>
<td>See response to comment AT-2b.</td>
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<tr>
<td>AT-25c</td>
<td>The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact. Details relating to the ROW vacation are included in EIR Section 3.4.2.1(i).</td>
</tr>
<tr>
<td>AT-26a</td>
<td>No buildings would be located within the area included in the ROW vacation. The area of the ROW vacation would be used for landscaping and would be used for the project to meet its greenscape requirements.</td>
</tr>
<tr>
<td>AT-26b</td>
<td>The purpose of narrowing La Jolla Scenic Drive North is to provide a new pathway/sidewalk and landscaping on the north side of the street.</td>
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<tr>
<td>AT-26c</td>
<td>With respect to on-street parking, The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces. Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.</td>
</tr>
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</table>
With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

With regards to the Class II bikeway, the La Jolla Community Plan was adopted in 2004. Figure 14 of the Community Plan shows the City’s Bicycle Master Plan existing and proposed bicycle network, which was developed in 2003. An update to the Bicycle Master Plan was adopted in December 2013. The portion of La Jolla Scenic Drive North along the southern end of the project site is not designated for any bikeway in the Bicycle Master Plan Update (2013). However, the improved pathway/sidewalk would be available for public use and would enhance bicycle connectivity adjacent to the project site.
LETTER

3-6. Paragraph 3: "The cul-de-sac would be redesigned to provide a bikeway, pedestrian path, and a landscaped entryway into residential streets from the intersection of Torrey Pines and La Jolla Village Drive."

AT-27a
1. What would the nature of this 'entryway' be; would it be a public easement, a public right-of-way, or simply accessible private land maintained for this use?
2. What mechanism would be in place to guarantee this access remains?
3. Foot traffic and bicycles may already cross between residential streets and the intersection utilizing public land. What benefit would be gained by making this private?
4. Has any provision been made for vacating the cul-de-sac without vacating the rest of the stretch of La Jolla Scenic Drive North?

AT-27b
1. What is the square footage of the Cliffridge property?
2. What is the minimum number of spaces required for the proposed use of the property in this option?
3. How was the figure of six spaces reached?

AT-27c
1. How long has this property been used for this purpose?
2. Is the current use compliant with all City codes?

"Phase 1 would consist of the continued, temporary operation of Hillel's religious administrative offices in this existing structure during construction of the permanent HUJ.

AT-28
1. How long may a given use be considered 'temporary'?
2. If the project is not approved, will there ever be a time when this use is not 'temporary'?

"The temporary use of the Cliffridge property would cease after occupancy of Phase 2, and the Cliffridge property would be returned to a single dwelling unit use."

AT-29
1. How would this be accomplished? Is a permit required?
2. Was a permit approved for the property's current use?

3-8. Paragraph 3: "Phase 2 would involve development of a vacant, 0.8-acre parcel located to the north and east of the parcel containing the existing Hillel office."

AT-30
1. Is the proposed ROW vacation included in the 0.8-acre measurement?
2. What are the sizes of the site, with and without the ROW vacation?

"Phase 2 would also involve the landscaping of the cul-de-sac and the vacated right-of-way between the Cliffridge property currently occupied by Hillel and the vacant parcel."

AT-31
1. See response to comments AT-15a and AT-15b.

AT-32a
1. See response to comment AT-2b.

RESPONSE

AT-27a A public access easement would be preserved across the pedestrian/bike path.

AT-27b The land referenced in this comment is not public land, but rather privately owned by Hillel. Approval of the project would result in an improved pathway/sidewalk for pedestrians and bicycle use.

AT-27c The ROW vacation for the portion of La Jolla Scenic Drive North between Torrey Pines Road and La Jolla Scenic Way, and the Street Vacation for the cul-de-sac are two different actions. See response to comment AT-25a.

AT-28 The square footage of the Cliffridge property is 1,792 square feet.

Under the Existing with Improvements Alternative a deviation from parking regulations would be required to provide approximately 6 parking spaces. The calculation of adequate parking is based on the same evaluation as the proposed project but on a smaller scale.

AT-29 See responses to comments AT-15a and AT-15b.

AT-30 See response to comment AT-15e. If the project is not approved, the existing conditions on the project site would remain. See EIR Section 9.2.2 discussing the No Project Alternative.

AT-31 The project permit would be conditioned to obtain a construction permit to convert the property back to single-family occupancy.

There is no permit associated with the property's current use. See response to comment AT-15b.

AT-32a See response to comment AT-2b.

The EIR provides an accurate project description (see Chapter 3) in accordance with the requirements of Section 15124 of the CEQA Guidelines. Specifically, the existing vacant lot upon which the project is proposed is a total of 0.80 acre. The project also includes a ROW vacation which would add an additional 0.49 acre to the project site. Therefore, upon project approval, the total site would be 1.29 acres. See EIR Figures 3-1 (size and location of ROW vacation) and 3-3 (final boundaries of the project site).
LETTER

AT-32b
1. This phrasing makes it sound as if a vacant parcel will remain at the completion of the project. Please rephrase.

3-15. Paragraph 3: “This would involve bringing the Cliffridge property up to all applicable code requirements for the intended use and occupancy.”

AT-33
1. How long can the current, temporary, use of this property continue, apparently out-of-code, if neither options are approved?

3-16. Paragraph 4: “Based upon Hillel’s historical programming and its future plans for the HCJL, Hillel activities would typically consist of small gatherings, primarily held during weekdays while UCSD is in session and consist of study groups, classes, lectures, meetings, Hillel professional staff activities, and periodic events.”

AT-34
1. Would this facility be open to the public, nearby residents, or only students? Where is this explicitly stated?

“With its proximity to campus, the HCJL would also serve as a place for students to “drop in” and connect with fellow students and Hillel staff, eat or study.”

AT-35a
1. Would there be any limits to the number of students who could “drop in”?

2. Given that many students park in neighborhoods and then walk or bicycle to campus, would students be able to park at the facility while they attend class on campus? How will this be enforced?

3. Given that some students who park in neighborhoods often chain their bicycles to nearby fences or signposts overnight for use during the day, would students be able to store their bicycles at the facility overnight so that they may park either at the facility or on neighborhood streets, pick up their bicycle, ride to class, return their bicycle to the facility, and then pick up their car? How would this be enforced?

3-16. Paragraph 5: “Hillel contemplates regular hours of operation between Monday through Friday, 9:00 A.M. to 10:00 P.M., but generally the facility would only be open during the evenings and on weekends if there is an activity planned at such times.”

1. Does this mean that the hours would be different then 9 a.m. to 10 p.m.? Or is it expected that 9 a.m. to 10 p.m. would be the standard hours of operation?

2. While food service is not planned for, the hours of operation sound very similar to those of a restaurant (particularly if the following sentence is taken into consideration). Are there any permits that restaurants are required to obtain regarding their hours of operation and could similar permit limitations be applied here to protect neighbors from excessive disturbance?

“Therefore, most activities would not occur during the typical A.M. and P.M. peak hours (7:00 A.M. to 9:00 A.M. and 4:00 P.M. to 6:00 P.M.).”

AT-35b
- No causal relationship exists between this sentence and the previous one. Please delete the word “therefore.”

RESPONSE

AT-32b
This sentence has been clarified in the Final EIR to state that in addition to the proposed building construction, the project would include landscaping.

AT-33
This comment is not related to the substance or adequacy of the EIR. No response is required.

AT-34
Hillel’s mission is explicitly stated in the EIR and is to serve as a religious center for Jewish students at UC San Diego. Therefore, the majority of Hillel’s programs would be geared toward and open to the undergraduate student audience. However, at times throughout the year, certain programs including study sessions, small religious gatherings, and discussion groups would be open to the public.

AT-35a
Student “drop ins” would be limited by the facility’s allowable occupancy. As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

AT-35b
Car and bicycle parking would be restricted to facility use only. Enforcement would be through signage referencing applicable municipal code regulations. Parked cars that are unaccounted for would be towed at the owner’s expense.
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<td>AT-36</td>
<td>As detailed in EIR Section 3.4.2.1(a), this would be standard hours of operation except on rare special occasions. Restaurants are not allowed within the zone. As stated above, the facilities hours of operations would be limited as disclosed. While food may be served at special events, there is no intention to have regular meals served or any food services provided.</td>
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<td>AT-37</td>
<td>The word “Therefore” was removed in the recirculated DEIR (December 2013). See response to comment AT-38a.</td>
</tr>
<tr>
<td>AT-38</td>
<td>The EIR relied on past activity level in making a fair assessment of the project and estimates the number of projected visitors and events as discussed in response to comment AT-38a.</td>
</tr>
<tr>
<td>AT-39</td>
<td>The Final EIR has been revised to clarify the specific limitation on special events and the allowable occupancy numbers. Daily occupancy is not expected to exceed 100 persons at any one time. The San Diego Police Department sponsors the Community Assisted Party Program (CAPP) to curb nuisance behavior at chronic party houses. The proposed project would not be subject to enforcement. Potential noise impacts are analyzed in EIR Section 4.8.</td>
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<td>AT-40</td>
<td>As stated in Final EIR Section 3.4.2.1, the facility occupancy is set at 220 (170 interior and 50 exterior). Any events that would expect greater numbers of attendees would be required to occur outside of the facility.</td>
</tr>
<tr>
<td>AT-41</td>
<td>The courtyard would only be accessed by pedestrians via La Jolla Village Drive and would also be accessible from the parking lot, which would be accessed via La Jolla Scenic Way.</td>
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LETTER

1. How was this number calculated as required parking for Phase 1?

3-20. Paragraph 3: "There are no specific parking regulations for the proposed use of Phase 2 of the HCL in the City’s Municipal Code..."

AT-43

1. Doesn’t the project claim the right to build on the site because of religious use?
2. Doesn’t the Municipal Code provide specific parking regulations for religious use?
3. If the proposed use of Phase 2 is not religious, what, specifically, is it? Is this use a permitted use in the SFR zone?
4. Given the variety of uses listed in Section 3.4.2, “Proposed Uses,” would it not be proper to consider the proposed use of Phase 2 as mixed use?
5. Doesn’t the La Jolla Shores PDO require that minimum parking requirements be totaled for each use when more than one use exist?

"The study assembled data from UCSD campus student surveys, UCSD Hillel program logs, surveys on parking and uses of two comparable Hillel facilities at University of California, Santa Barbara (UCSB) and University of California, Los Angeles (UCLA), and information on other Hillel centers’ parking supply."

AT-44

1. Why is this data considered valid for this project when similar data was struck from the environmental document for a previous project on this site?

"A total of 27 spaces are proposed for Phase 2, including one handicap accessible space and one van accessible space."

AT-45a

1. What is the actual breakdown of spaces?
2. Is this parking controlled in any way?
3. What enforcement mechanisms, if any, would be put into place to prevent members of the general public from using the available parking?
4. Would students affiliated with the applicant be allowed to park in these spaces during the day so that they may walk to classes on campus?
5. Is sufficient space available for cars failing to find an available space to turn around? Does this also take into account the limited visibility until a car has actually turned the corner into the lot?
6. Given that entrance/egress to and from the lot is constrained to a single access point, are there any provisions planned to alert visitors that the lot may be full?

"Showers are also included in the design for Phase 2 in order to encourage cycling."

AT-45b

1. Are there any pertinent Health or Safety requirements necessary for the showers?
2. Are the showers ADA-accessible?

3-20. Paragraph 4: "The partial retaining wall and landscaping combined with the solar carport would provide some visual screening of the parking and shielding of headlights at night."

AT-47

1. What is the height of this retaining wall, both from the street side and from the side of the parking lot?

RESPONSE

AT-42

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone.
Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces. Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

The project is an allowable use in the proposed location due to its religious use. Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “... is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project
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<td>AT-43 (cont.) description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code. The proposed use is a single use and is not considered a mixed-use project. With respect to required parking numbers, see response to comment AT-45.</td>
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</tr>
<tr>
<td>AT-44</td>
<td>The information provided for this project cannot be compared to previous projects because of the nature of the project plan and environmental document prepared.</td>
</tr>
<tr>
<td>AT-45a</td>
<td>There would be 25 regular spaces; two handicap accessible (one of those van-accessible). Spaces would be available to those using the facility. See response to comment AT-38b.</td>
</tr>
<tr>
<td>AT-45b</td>
<td>The site plan has been reviewed and approved by the Department of Development Services (DSD). All code requirements pertaining to parking lots would be met.</td>
</tr>
<tr>
<td>AT-46</td>
<td>The comments regarding the shower do not raise any substantive issue relating to the adequacy or accuracy of the EIR. No further response is required.</td>
</tr>
<tr>
<td>AT-47</td>
<td>As detailed in DEIR Section 3.4.2.1, walls would be at least four feet in order to screen parking areas, but would not exceed a height of six feet.</td>
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<tr>
<td><strong>AT-48</strong></td>
<td>This sentence has been revised in the Final EIR to the following: “Landscaping would also include temporary bike path fencing (to be removed once Phase 2 is completed) and development of a new replacement bus stop on La Jolla Village Drive.”</td>
</tr>
<tr>
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<td>There is a “bus only” lane that currently exists at the bus stop; therefore, no bulb-out would be required.</td>
</tr>
<tr>
<td><strong>AT-49</strong></td>
<td>Approximately 75 percent of the landscaping is within the proposed ROW vacation. The ROW vacation area would be required in order to meet landscaping requirements.</td>
</tr>
<tr>
<td><strong>AT-50a</strong></td>
<td>The bike path would be approximately 110 feet long and approximately 10 feet wide.</td>
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<td>The bike path was designed in accordance with City standards which considers visibility in the design of the path. No impairment of visibility would occur.</td>
</tr>
<tr>
<td><strong>AT-50b</strong></td>
<td>Cyclists would be required to obey existing traffic regulations and consider the speed before exiting onto the street. The location of the ramp was determined with consultation of the City traffic engineers. Placing the ramp at the proposed location provides cyclists and other users the most visibility.</td>
</tr>
<tr>
<td><strong>AT-51</strong></td>
<td>Features of the greenspace, including the water fountain, would be paid for and maintained by the applicant. These features would be located approximately 35 feet northwest of La Jolla Scenic Drive North on the north side of the path and the bench would be visible from La Jolla Scenic Drive North and Cliffridge Avenue.</td>
</tr>
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<td>Any lighting along this path would be provided in accordance with City lighting standards.</td>
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<td>The design of the bench will not be suitable for any person to lay down, sleep, etc. In addition, the project will include surveillance cameras from the buildings. The path is not “heavily screened”; the bench will be visible from La Jolla Scenic Drive North and Cliffridge Avenue and will be softly lit.</td>
</tr>
<tr>
<td><strong>AT-52</strong></td>
<td>The project would maintain public access, as proposed.</td>
</tr>
<tr>
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</table>
| **3.23. Paragraph 6:** “New and improved landscaping would be provided around the perimeter of the vacant site.”<br><br>AT-53  
- “New and improved landscaping” sounds as if consideration was given to maintaining the existing landscaping. Please refrain from using “New and improved”.<br>- “vacant site” sounds as if perimeter landscaping will be placed prior to construction. Please change to read “developed site”.

“The total area within the street yard along La Jolla Scenic Drive North, La Jolla Scenic Way, La Jolla Village Drive, and Torrey Pines Road equals 25,844 square feet, and is proposed to contain a planting area of 14,987 square feet (of Torrey pines and other native trees and shrubs).”

AT-54  
1. Is this with or without the ROW vacation?<br>2. What would these figures be without the ROW vacation?<br>3. Why does the footprint of the development in Figure 3-10 appear to be substantially greater than 40% of the total site? Are the courtyard pavers being included in this calculation?

**3.24. Paragraph 4:** “There would also be an entrance sign located on a retaining wall.”

AT-55  
1. Which entrance? Following mention of signs regarding the bike path: this sounds like another sign at the entrance to the bike path, but there are no retaining walls nearby.

**3.41. Paragraph 3:** “A new 15-foot easement reservation for storm drains is proposed in the far southeast corner of the vacant site.”

AT-56  
1. Is this a new easement or is it being relocated from elsewhere?<br>2. Why isn’t this mentioned along with the SDP and ROW vacation as a requested action?<br>3. What is the purpose of such an easement?

**3.41. Paragraph 4:** “All water facilities necessary to provide water service (domestic, irrigation, and fire) to the project site already exist at sufficient capacity to adequately serve the proposed redevelopment.”

AT-57a  
1. Does this include reclaimed water (purple pipes)? If not, does this mean that irrigation will be using potable water?<br>2. What are the ages and conditions of these facilities? Will any be replaced during the course of construction?

AT-57b  
3. Why is the new project referred to as ‘redevelopment’ when no prior development has ever existed?” (This wording also occurs at 3.41, Paragraph 5 and 3.42, Paragraph 1.)

“All existing water easements and encumbrances would remain, with the exception of a portion of one water facilities easement to be vacated.”

AT-58  
1. Why was this easement vacation not included with requested actions?

AT-53 This sentence has been revised in the Final EIR: to clarify that the landscaping would be new and complement the development.

AT-54 The proposal includes the ROW vacation; therefore, no landscaping calculations without the ROW are required.

Landscape, including pavers, is not included in coverage calculations. Therefore, the courtyard pavers are not included in the footprint calculation.

AT-55 This sentence refers to the entrance sign on the southeastern portion of the site.

AT-56 This sentence is referencing a new easement reservation for the proposed storm drain system. This type of easement is not included in Section 3.3 because it is not a discretionary action that is part of the SDP application.

The purpose of the easement is to allow the placement of storm drain lines to serve the project. See EIR Section 3.0(i) for details.

AT-57a There are no purple pipes serving the property.

The City has determined that adequate facilities are available to serve the project. The project would not require the replacement of any public water or sewer mains.

AT-57b This sentence was revised in the recirculated DEIR (December 2013).

AT-58 Similar to the storm water easement (see response to comment AT-59), there is no “official” action necessary for the temporary water easement.
Section 3.4.2.1 was revised in the recirculated DEIR (December 2013) to clarify this issue. The Agreement is only mentioned once in the section.

The Agreement would be made with the City of San Diego and is a discretionary action. Therefore, it would not be included in Section 3.3.

The Encroachment Maintenance and Removal Agreement is negotiated during the final building permit process (i.e., following approval of the EIR). Final disposition refers to the “final site plan” agreed to by the applicant and the City’s Engineering Department.

Only the discretionary actions are summarized in Section 3.3. This type of easement would be subject to ministerial action once the discretionary process is complete.

See responses to comments AT-9 and AT-60.

See response to comment AT-60.

The comment regarding underground utility schedules does not raise an issue related to the substance or adequacy of the EIR. No further response to required.

An existing storm drain occurs within this easement. Only the discretionary actions are summarized in Section 3.3.

As detailed in EIR Chapter 3, “Prior to grading operations, the general contractor would work with the City’s Environmental Services Department to determine if another site in the vicinity could reuse the soil, or would haul the soil to an appropriate recycling facility.” This amount is necessary to provide for site development in accordance with the project as detailed in Chapter 3.
The ROW vacation is articulated as one of the required discretionary actions for implementation of the project. See EIR Section 3.3.1.3.

The project includes mitigation outlined in DEIR Section 4.3.3.3, which requires that if removal of habitat is proposed during the raptor breeding season, pre-construction surveys would be required to determine the presence or absence of nesting birds on the proposed area of disturbance. If nesting birds are detected, a letter report or mitigation plan would be required to assure no impacts to the birds. See Mitigation Measure BIO-1 for details.

See response to comment AT-17.

The comment regarding the current use of the property does not raise an issue relating to the substance or adequacy of the EIR. No further response to required.

If both proposed options are denied, the code violation associated with the religious use would require resolution.

The new pedestrian curb ramp on Cliffridge Avenue is a required design feature of the project. The width of the sidewalk would be 2. Five foot, consistent with City-standards. Level passing space would be five feet, as required under ADA standards.

As detailed in EIR Section 3.4.3.1, under the Phase 1/Phase 2 option the westerly cul-de-sac portion of La Jolla Scenic Drive North would be abandoned and the street would be reconfigured as a curve into Cliffridge Drive. The existing stop sign on Cliffridge Avenue at La Jolla Scenic Drive North would be removed, and a new left/curve sign would be installed on La Jolla Scenic Drive North.
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<tr>
<td>AT-73</td>
<td>The Final EIR was been revised to include all analysis of the Existing with Improvements Alternative within the alternatives chapter (Chapter 9.0) of the document. This will create better clarity for the reader. As detailed in EIR Section 9.2.1 construction for the Existing with Improvements Alternative would last approximately three to six months.</td>
</tr>
<tr>
<td>AT-74a</td>
<td>As detailed in Section 3.4.3.1 of the recirculated DEIR (December 2013), the driveway would be 24 feet wide. The proposed width would comply with code requirements. As detailed in EIR Section 3.3.1.1, a deviation from the driveway curb cut requirements of the Municipal Code is proposed for Phase 1 only. The driveway would only be accessible via a right turn, and would only be exited via a right turn. There is a raised median along La Jolla Scenic Way, which would prevent access any other way.</td>
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<tr>
<td>AT-74b</td>
<td>There is no expectation of queuing to occur. Any event which the parking cannot readily accommodate would be subject to a Parking Management Plan which would require parking at an alternative location.</td>
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<tr>
<td>AT-74c</td>
<td>See response to comment AT-48.</td>
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<tr>
<td>AT-74d</td>
<td>The speed limit of La Jolla Scenic Way is 30 miles per hour. With respect to site distance associated with the project's parking lot, A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.</td>
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AT-73 1. What is the estimated construction time for this option?  

**3.45 Paragraph 4:** “Here, a new 23-foot-wide driveway and curb cut would be constructed.”  

AT-74a 1. Please mention that the driveway will provide both entrance and egress from the lot.  2. Which is correct: this statement or the plans in Figure 3-8, which present a different width?  3. If the above statement is correct, does the driveway width comply with minimum requirements in the San Diego Municipal Code for a non-residential driveway? If not, why wasn’t such a deviation called out in the requested Discretionary Actions (Section 3.3)?  4. Will turns from the driveway be allowed in either direction? If not, how will this be indicated?  5. What provisions will be made to accommodate queuing vehicles on the street?  6. Will the parking lot be visible from the street?  7. What will be the speed limit of La Jolla Scenic Way?  8. What is the minimum stopping sight distance of a vehicle traveling at the speed limit?  9. What is the distance between the driveway and the intersection of La Jolla Village Drive and La Jolla Scenic Way?  

*For adequate sight distance, 25 feet of curb would be painted red just north of the proposed driveway on La Jolla Scenic Way.*  

AT-75 1. How many parking spaces will be lost between the driveway and red curb?  2. How was 25 feet arrived at as a distance for adequate sight?  

*Bicycles would be provided enhanced access to the Phase 2 site from the proposed bike path from Torrey Pines Road/La Jolla Village Drive.*  

AT-76 1. This sentence does not clearly indicate from which direction bicycles should enter. 2. Is the sidewalk on this (which?) side of adequate width to accommodate both bicyclists and pedestrians safely?  

**3.45 Paragraph 5:** “For Phase 1/Phase 2, the westerly cul-de-sac portion of La Jolla Scenic Drive North would be abandoned and the street would be reconfigured as a curve into Cliffridge Drive.”  

AT-77 1. What would be the resulting minimum curve radius?  2. What is the minimum curve radius for a 2-lane collector street?  

*The existing stop sign on Cliffridge Avenue at La Jolla Scenic Drive North would be removed, and a new left/curve sign installed on La Jolla Scenic Drive North.*  

AT-78 1. Why install a curve sign on La Jolla Scenic Drive North and not on Cliffridge Avenue?  2. What is the purpose in removing the existing stop sign?  3. Is it wise to promote higher vehicular speeds through an acute curve?  4. Is it wise to promote higher vehicular speeds through residential streets?
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<td>AT-75 Three off-site spaces would be lost in order to meet sight distance stopping requirements. With respect to the determination of adequate sight distance, see response to comment AT-77d.</td>
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<td>AT-76 Bicycles would enter the project site via either the path along La Jolla Scenic Drive North or the path along La Jolla Village Drive. Figure 2-3 of the traffic study specifically shows the connection between the site and the path. The sidewalk would be improved to meet City standards and would accommodate pedestrians and bicyclists. See response to comment AT-53.</td>
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<td>AT-77 The minimum curve radius for a two-lane collector in the City of San Diego is 450 feet. The reconfigured street would be designed to meet City standards.</td>
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<td>AT-78 The City would ultimately decide if a curve sign should also be installed on Cliffridge Avenue. Since the &quot;intersection&quot; will only be a curve in the road, a stop sign would not be warranted and would be confusing to drivers. This would not promote higher vehicular speeds. Curve sign should actually tell drivers to slow down. With respect to any additional signage, the City will make the final determination if a sign or signs would be necessary at this location.</td>
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</table>
LETTER

5. Will any indications be made to warn drivers of bicycles exiting the proposed bike path perpendicularly to this acute curve?

"By providing a curve, local vehicular circulation would be enhanced as there would no longer be a need for a stop sign."

AT-79

- This is not a causal relationship. Please rephrase.

"At 34 feet wide, La Jolla Scenic Drive North has been designed to conform to City traffic standards and street design requirements."

AT-80a

1. What is the current width of La Jolla Scenic Drive North?
2. What is the current width of Cliffridge Avenue?
3. What are implications of directing through traffic directly into a narrower street?
4. How will the La Jolla Scenic Drive North's width be impacted by the ROW vacation?

With respect to the effect of narrowing La Jolla Scenic Drive North, see response to comment AT-25c.

AT-80b

As discussed in EIR Section 3.4.2.1(i) the Phase 1/Phase 2 project proposes to narrow La Jolla Scenic Drive North by 2 feet to provide for a 12-foot parkway on the north side of the roadway with increased landscaping. La Jolla Scenic Drive North currently measures 36 feet wide from curb to curb. As further detailed in EIR Section 4.2.5.1, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards.

AT-80c

La Jolla Scenic Drive North is classified as a 2-Lane Collector in the La Jolla Community Plan (see EIR Section 4.2.1.1(a)). The reduction of the roadway by two feet would not affect the road classification. No community plan amendment would be required.

AT-81

As detailed in EIR Section 3.4.2.1(i), the strip is 2,183 square feet. The 2,183-square-foot area is not included within the ROW vacation being requested.

AT-82

1. What is the size of the "strip"?
2. Why not eliminate the area of the "strip" from the total area being requested through the ROW vacation?

AT-83

- Please clarify, exactly, from which streets or paths entry will be permitted.

AT-84

3-46. Paragraph 2: "Pedestrians could also access the Phase 2 site along the bike path from Torrey Pines Road/La Jolla Village Drive..."

As illustrated on EIR Figure 3-10, there is pedestrian access to the site from La Jolla Village Drive and La Jolla Scenic Way. Vehicular access is from La Jolla Scenic Way.

RESPONSE

AT-79

This sentence was not included in the Recirculated DEIR (December 2013).

AT-80a

The current width of La Jolla Scenic Drive North is 36 feet. The current width of Cliffridge Avenue is 30 feet.

With respect to the effect of narrowing La Jolla Scenic Drive North, see response to comment AT-25c.

AT-80b

As discussed in EIR Section 3.4.2.1(i) the Phase 1/Phase 2 project proposes to narrow La Jolla Scenic Drive North by 2 feet to provide for a 12-foot parkway on the north side of the roadway with increased landscaping. La Jolla Scenic Drive North currently measures 36 feet wide from curb to curb. As further detailed in EIR Section 4.2.5.1, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards.

AT-80c

La Jolla Scenic Drive North is classified as a 2-Lane Collector in the La Jolla Community Plan (see EIR Section 4.2.1.1(a)). The reduction of the roadway by two feet would not affect the road classification. No community plan amendment would be required.

AT-81

As detailed in EIR Section 3.4.2.1(i), the strip is 2,183 square feet. The 2,183-square-foot area is not included within the ROW vacation being requested.

AT-82

See response to comment AT-44.

AT-83

The bicycle parking facilities would be permanently fixed within the project site for temporary use by site visitors. Bicycles would not be allowed to be "permanently" stored at the project site.
Currently there is no dedicated bicycle path in this location. A dedicated bike path would provide enhanced circulation as opposed to sharing the cul-de-sac with vehicles.

As discussed in EIR Section 3.5(a), the Phase 1/Phase 2 project would provide priority parking for low-emitting and fuel-efficient vehicles. Low-emitting vehicles are defined by the U.S. Green Building Council (USGBC) as vehicles that are classified as Zero Emission Vehicles (ZEV) by the California Air Resources Board. Fuel-efficient vehicles are defined as vehicles that have achieved a minimum green score of 40 on the American Council for an Energy Efficient Economy (ACEEE) annual vehicle rating guide.

The proposed project would provide two parking spaces for low-emission vehicles; however, no charging stations would be available. Enforcement would be through signage referencing applicable municipal code regulations.

The proposed 17.5 percent was an estimate based on the analysis relative to the 2008 building code. The Final EIR has been revised to reflect the required reductions based on the updated 2013 Building Code.

As detailed in EIR Section 4.5.3.1, with the photovoltaic panels, the total electricity consumption would be 30,855 to 43,197 kWh per year. The size of the system would be 29.761 kW (CEC AC Rating).

At the time the EIR was prepared, the required state and local diversion rate was 50 percent. Since that time, AB 341 increased the state-mandated diversion rate to 75 percent. The project would comply with current diversion requirements. The EIR has been updated to clarify the project’s consistency with LEED silver requirements.

The Final EIR has been revised to remove this sentence. While the project would comply with sustainable project standards, it would likely increase the demand for recycled building because there is no demolition.

The project would comply with the City’s Recycling Ordinance.
The landscape plan was developed by a licensed landscape architect and meets all requirements under City's landscape ordinance. Strategies used to meet these requirements include meeting the City's requirements for "points" or number of plants, and siting trees over sidewalks and other paved areas. See Landscape Plan (EIR Figure 3-10).

This was revised the recirculated DEIR (December 2013) to include both pounds and tons.

The project site’s was described under the previous Community Plan as a landscaped area.

With respect to the property's compliance with codes and regulations, see response to comment AT-15b.

The comment regarding how the project was previously referenced does not raise an issue related to the current substance or adequacy of the EIR. No further response is required.

EIR Section 3.6.1 gives a succinct history of the project. The year of the MND is correct. There was no 2008 project as identified in the comment.
AT-97 The sentence is referring to changes that have led to the currently proposed Phase1/Phase 2 project.

AT-98 See response to comment AT-38a.

AT-99 See EIR Table 4.12-1 which summarizes the square footage of adjacent structures and lot sizes within the vicinity of the project.

AT-100 The change in parking numbers was a result of the revised site plan, and lower occupancy for facility operations. The revised project did not warrant underground parking.

With respect to the proposed number of parking spaces, see response to comment AT-45.

AT-101 This was corrected in the recirculated DEIR (December 2013) which characterizes the homes across La Jolla Scenic Way as “attached single-family.”

AT-102 Pursuant to CEQA, the project must be analyzed against the existing condition, not in comparison to a previous project. The visual analysis is included in EIR Section 4.12, where impacts were determined to be less than significant.
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<tr>
<td>AT-103</td>
<td>EIR Section 4.12.6.1 analyzes the project’s potential impacts due to light and glare. As stated therein, the Phase 1/Phase 2 project would not shed substantial light onto adjacent, light-sensitive properties. The project’s parking lot would be partially (eastern and southern parking spaces) bordered by a retaining wall and include landscaping and a carport structure with solar photovoltaic panels on top. The partial retaining wall and landscaping combined with the solar canopy/carport would provide shielding of headlights at night as vehicles exit the parking lot on La Jolla Scenic Way. Therefore, it was determined that impacts associated with headlights on neighboring properties would be less than significant.</td>
</tr>
<tr>
<td>AT-104</td>
<td>Both the Figure and EIR text is correct. Figure 3-8 illustrates the curb cut would be 24 feet under Phase 2 of the project. The deviation is proposed for Phase 1 only. During Phase 1 (i.e., construction of Phase 2), the project applicant proposes a Temporary Parking Plan that would include a 12-foot-wide temporary curb cut. Upon occupancy of Phase 2, the Cliffridge property would return to residential use and the 12-foot-wide driveway would be adequate. The final project would have the required 24-foot curb cut as illustrated on Figure 3-8.</td>
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<tr>
<td>AT-105</td>
<td>The comment regarding the previous project does not raise an issue related to the current substance or adequacy of the EIR. No further response is required.</td>
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<tr>
<td>AT-106</td>
<td>The EIR (December 2013) removed the word “various.” The paragraph at issue correctly represents the surrounding land uses. No revisions to the Final EIR text are required.</td>
</tr>
<tr>
<td>AT-107</td>
<td>This was corrected in the recirculated EIR (December 2013) which characterizes the homes further east of La Jolla Scenic Way as “attached single-family residences.”</td>
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<td>AT-108</td>
<td>This portion of the LJSPDO text necessary to categorize the project was included.</td>
</tr>
<tr>
<td>AT-109</td>
<td>The comment does not raise an issue related to the current substance or adequacy of the EIR. No further response is required.</td>
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## LETTER

### 4.1.8 Paragraph 3

1. Could the proposed project meet all applicable development regulations if the ROW vacation were not approved, or would additional deviations (or variances) be required?

### 4.1.9 Paragraph 2

1. This sentence was removed in the recirculated EIR (December 2013).

### 4.1.9 Paragraph 4

1. The project as proposed and designed would not meet the applicable development regulations without the ROW vacation.

### 4.1.9 Paragraph 5

1. The project as proposed and designed would not meet the applicable development regulations without the ROW vacation.

## RESPONSE

### AT-110

The project as proposed and designed would not meet the applicable development regulations without the ROW vacation.

### AT-111

This sentence was removed in the recirculated EIR (December 2013).

### AT-112

The project is not subject to the Campus Parking Overlay Zone or Maximum Paving and Hardscape regulations. The Final EIR has been revised to remove all discussion related to this issue.

The project meets the 30 percent landscape requirement and no significant impact would result.

### AT-113

See response to comment AT-115.

### AT-114

See response to comment AT-28.

### AT-115

There is a single purpose for the requested deviation. The purpose of the deviation to allow for hardscape in excess of the residential zone limits.

Drainage impacts are analyzed in EIR Section 4.10. As stated therein, no substantial changes in runoff or drainage would occur as a result of this project. Additionally, this parking area would be in a location where the garage and deck are currently located, and would not result in hydrological impacts related to the increase of impervious surfaces. Landscaped areas would assist in the prevention of heat islands. See response to comment AT-95.
LETTER

2. If the correct need for the deviation stems from the Maximum Paving and Hardscape requirement, couldn’t this have a significant impact on drainage and the heat island effect?

“The proposed deviations are appropriate for this location and would alleviate a need for parking on nearby streets while also creating a design that is compatible with the adjacent residential scale and setting.”

AT-116 Please remove the phrase “is appropriate for this location,” as that judgment should be left to the deciding agency.

4.1.10. Paragraph 3: “No mitigation is required.”

AT-117 This may be incorrect given the conflicting nature of the requested deviation for the Existing with Improvements Option.

4.1.11. Paragraph 2: “The LJSPD provides additional guidance regarding permitted uses within this zone and lists churches, temples, or buildings of a permanent nature, used primarily for religious purposes as permitted uses within the single-family zone.”

AT-118 This sentence belongs in discussion regarding the La Jolla Shores PDO, not the section regarding the General Plan or La Jolla Community Plan. Please revise to say something similar to “The LJSPD provides additional guidance regarding permitted uses. This will be addressed in the next section.”

4.1.11. Paragraph 3: “However, the project would provide additional landscaping and open space areas with pedestrian pathways that would provide a community amenity and inviting entrance for the La Jolla Shores neighborhood.”

AT-119 If the purpose of the project is to provide an inviting entrance to the neighborhood, why wasn’t the neighborhood consulted about the design?

4.1.11. Paragraph 4: “Phase 1/Phase 2 would include modifications to the local circulation system to improve the pedestrian environment and connectivity and provision of bicycle storage that would be consistent with the La Jolla Community Plan Transportation Systems Element, City of San Diego General Plan Mobility Element, and Bicycle Master Plan.”

AT-120 The La Jolla Community Plan calls for a Class II Bikeway on La Jolla Scenic Drive North along the southern edge of the Phase 2 site. Is this accounted for in the project? If not, would this not be inconsistent with the La Jolla Community Plan?

2. Would the narrowing of La Jolla Scenic Drive North promote or hinder the usage of the street as a bicycle thoroughfare? How can such a narrowing be considered consistent with promoting La Jolla Scenic Drive North as a Class II Bikeway?

RESPONSE

AT-116 See response to comment AT-115.

AT-117 The project is not subject to the Campus Parking Overlay Zone or Maximum Paving and Hardscape regulations. The Final EIR has been revised to remove all discussion related to this issue.

AT-118 EIR Section 4.1.4.1 was revised in the recirculated EIR (December 2013) to clarify that the project would be an allowable use under the LJSPDO. Specifically, the discussion relating to permitted religious use is found under the section headed La Jolla Shores Planned District Ordinance and states the following:

Municipal Code Section 1510.0303(e) addresses Single-Family Zone—Permitted Uses, listing “churches, temples, or buildings of a permanent nature, used primarily for religious purposes” as a permitted use. Phase 1/Phase 2 would provide staff offices and a larger meeting space for religious programs related to Jewish holidays and festivals, the study of Jewish texts, as well as other functions that Hillel considers essential to Jewish religion, identity, and living. Therefore, Phase 1/Phase 2 would be consistent with the zoning of the LJSPD Ordinance.

AT-119 The comment regarding community outreach does not raise an issue related to the substance or adequacy of the EIR. No further response is required.

AT-120 See the responses to comments AT-26b and AT-26c.
4.1.11. Paragraph 5: “In addition, given certain design features incorporated Phase 1/Phase 2 (such as the sustainability features, which serve to reduce energy and water consumption), demand on public facilities and services such as energy, water, and solid waste disposal would be minimized to the maximum extent feasible.”

AT-121

- Please do not claim these to be the “maximum extent” that sustainability features could be implemented, as more extreme measures (e.g. xeriscaping) could be used. 

Rephrase.

4.1.11. Paragraph 6: “Through the enhanced pedestrian environment, sustainable building features, and attention to architectural design and scale, Phase 1/Phase 2 would implement the applicable goals and objectives of the General Plan and La Jolla Community Plan. Because Phase 1/Phase 2 would not conflict with the environmental goals, objectives, and recommendations in the General Plan or the La Jolla Community Plan, no impacts would result.”

AT-121

- What about the Class II Bikeway called for in the La Jolla Community Plan? Even if the impact is deemed insignificant, shouldn't this be addressed?

4.1.12. Paragraph 1: “Section 1510.0302 of the LJSPD, the permitted use regulations, states:
The intent of these regulations is to preserve and enhance the environmental quality of La Jolla Shores area as a place to live. A variety of housing types including single and multi-family units, hotels and hotels supported by the necessary public facilities should be encouraged. The development of the businesses necessary to serve the residents and visitors to the area will be permitted in a compact and centrally located commercial area. Large high-rise buildings, out of scale with other structures within the community as well as automobile drive-in and drive-through establishments will be prohibited.”

AT-123

1. What is the point of including this passage?
2. Why are other provisions, such as those discussing area character or design principles, not mentioned?

4.1.12. Paragraph 2: “Specifically, Municipal Code Section 1510.0303(e) addresses Single Family Zone—Permitted Uses, listing “churches, temples, or buildings of a permanent nature, used primarily for religious purposes” as a permitted use.”

AT-124a

1. Section 3.4.2.1(e) suggests that the use of the facility may not be a religious one (since specific regulations apply for a religious use). If this is the case, how can the justification for the stated use be made?

AT-124b

2. The full name of the project, “The UCSD Hillel Center for Jewish Life,” suggests that this building is strictly tied to the University in both nature and use. As such, couldn't the argument be made that the use of the facility is, at least in part, institutional?

AT-124c

3. Considering that the specific use of the project is made up from a number of uses, including Religious, Institutional, Office, etc., how can one permitted use be upheld as justification over other, non-permitted uses?

AT-124d

4. What is the full text of the Municipal Code Section 1510.0303(e)?

AT-124e

5. Why is no mention made of a Conditional Use Permit as being necessary?

AT-121 The sentence has been revised in the Final EIR to state:

In addition, given certain design features incorporated into Phase 1/Phase 2 (such as the sustainability features, which serve to reduce energy and water consumption), demand on public facilities and services such as energy, water, and solid waste disposal would be minimized to the maximum extent feasible.

AT-122 See the response to comment AT-26c.

AT-123 The passage is intended to provide an overview of the LJSPD Ordinance relative to use.

The provisions referenced in the comment are discussed in Section 4.12.1.3 under Visual Effects.

AT-124a See the response to comment AT-46.

AT-124b The project name does not suggest ties to the University; however, it is anticipated that it would be used by students attending the University (see EIR Chapter 3).

The variety of religious programs and the need for assessor uses does not create multiple designations of use. Overall, the project would be used primarily for religious purposes in accordance with the mission of Hillel. With respect to assessor uses, the project represents a religious use which, like other churches, temples, and places of worship, would inherently include some accessory uses, which are considered part of the primary use. As detailed in Section 3.4.2 of the EIR, the proposed project would include multiple component parts which support the primary use of project (see response to comment I-1). Besides the library/chapel, religious activities would take place in the lounge and meeting rooms, as well as the outdoor courtyard space. The kitchen would be used to prepare traditional meals during religious holidays. Bathrooms are necessary for religious staff members and visitors. A shower is necessary to encourage bicycling to the site and a commonplace within facilities of this nature.
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<th>LETTER</th>
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<tr>
<td></td>
<td><strong>AT-124c</strong> The Municipal Code Section is excerpted below:</td>
</tr>
<tr>
<td></td>
<td><strong>§1510.0303 Single-Family Zone - Permitted Uses</strong></td>
</tr>
<tr>
<td></td>
<td>In the Single-Family (SF) Zone, designated on that certain map referenced in Section 1510.0102, no building or improvement or portion thereof shall be erected, constructed, converted, established, altered, or enlarged, nor shall any premises be used except for one or more of the following uses…</td>
</tr>
<tr>
<td></td>
<td>(e) Churches, temples or buildings of a permanent nature, used primarily for religious purposes.</td>
</tr>
<tr>
<td></td>
<td>The project is an allowable use under this code section. See response to comment AT-46.</td>
</tr>
<tr>
<td></td>
<td><strong>AT-124d</strong> A Conditional Use Permit is not required for approval for either the Phase 1/Phase 2 or the Existing with Improvements Alternative.</td>
</tr>
</tbody>
</table>
6. Is a Conditional Use Permit planned for the facility? If so, what would it include and shouldn’t be included as a requested discretionary action; if not, why not?
7. How can the inclusion of any restrictions in the Site Development Permit be considered sufficient when the Municipal Code explicitly requires a Conditional Use Permit? Does department policy trump the Municipal Code?

4.1.12 Paragraph 3: "With the requested deviation described above under Section 4.1.3. Phase 1/Phase 2 would comply with all other applicable Municipal Code and development regulations."

AT-125 A Conditional Use Permit would not be required for the project. See response to comment AT-46.

AT-126 Steep slopes are defined by the Environmentally Sensitive Lands (ESL) Ordinance as natural slopes over 25 percent in grade. No such slopes exist on-site. Therefore, no cuts into steep slopes would occur. No revisions to the EIR are required.

AT-127a See response to comment AT-45.

AT-127b See response to comment AT-28.

AT-127c Municipal Code Section 1510.0401(o) provides design regulations relating to the screening of parking areas. As discussed in EIR Section 4.12.3.1, the project would provide landscaping and walls to provide a visual screening of the parking lot.

The City of San Diego Development Services Department reviews all project site plans for conformance with applicable plans, ordinances, and manuals. The project has been deemed to be in conformance with this code section.

AT-127d Municipal Code Section 1510.0401(p) provides design regulations relating to landscaping requirements. As discussed in EIR Section 4.12.3.1, the project would provide adequate landscaping consistent with all relevant regulation. This would include providing 10 percent of landscaping on the parking area.

The City of San Diego Development Services Department reviews all project site plans for conformance with applicable plans, ordinances and manuals. The project has been deemed to be in conformance with Municipal Code Section 1510.0401(p).

AT-128 The project’s front would be considered La Jolla Village Drive. A specific address would be designated at the time of construction.
LETTER

4.1-13, Paragraph 3: "The site is predominately flat, with manufactured slopes at the north and west property edges."

AT-129

- Please replace 'west' with 'east.'

4.1-14, Paragraph 1: "Off-street parking would be provided according to standards set by the Traffic Impact Analysis (see Appendix B), which was in turn approved by the City of San Diego Development Services Department."

AT-130

1. Does the City of San Diego Development Services Department have the authority to approve a Traffic Impact Analysis of this Process Level? Doesn't this authority reside in the Lead Agency?
2. Does the authority of the City of San Diego Development Services Department extend to the decision of how to interpret provisions of the Municipal Code with respect to required minimums without any input other than that of the applicant or their consultants?
3. Does this approval mean that consultants, hired by those seeking to build projects, are ultimately responsible for determining the interpretation of the Municipal Code and other Land Use plans and also setting precedents within communities based on their own terms rather than by legislative action by publicly elected officials?

4.1-14, Paragraph 4: "Phase 1/Phase 2 would adhere to the height limit of 30 feet and maximum 60 percent for coverage. Height has been determined from pre-existing grade."

AT-131

1. What is the maximum height determined from finished grade?
2. Would a calculation of maximum height from finished grade conflict with guidelines set forth in the La Jolla Shores Design Manual?

4.1-14, Paragraph 6: "However, the section contains guidelines for higher-density residential buildings, such as apartments, in order to better blend in with a single-family residential zone. Thus, this portion of the guidelines would be applicable to Phase 1/Phase 2."

AT-132

1. This suggests that the project's intended use will be more intense than the use associated with a single-family residence. Wouldn't it therefore be reasonable to build in limitations, such as a Conditional Use Permit, to protect the single-family residences from the ravages of such increased intensity?

4.1-15, Paragraph 2: "The Design Manual states: "Reduce pavement width where possible to bring the street into a better scale relationship with the houses." This principle would be adopted into Phase 1/Phase 2 with the design of the reconfigured La Jolla Scenic Drive."

AT-133

1. Does this mean that La Jolla Scenic Drive North will be narrowed?
2. Could this also be read to mean that the street should be widened to bring the street into a better scale relationship with the large facility across the street?
3. What benefit does this bring to the community?

RESPONSE

AT-129

This text was revised in the recirculated EIR (December 2013).

AT-130

The Development Services Department is the department within the City, as lead agency, with the expertise and authority to review and accept a Traffic Impact Analysis. Notwithstanding the author of the studies, the Development Services Department has the responsibility to assure that the project conforms to all City regulations and has the authority to make recommendations relating to approval to the decisions makers.

AT-131

The maximum height as determined from finished grade is 28 feet. As designed, the height is within the La Jolla Shores Design Manual.

AT-132

The project does not require a Conditional Use Permit. See response to comment A46.

Intensity of its use would be controlled through conditions of approval based on occupancy and event planning. See response to comment AT-38a.

AT-133

The project would reduce the width of La Jolla Scenic Drive North by approximately two feet. See response to comment AT-25c.

The scale of the project has been designed to fit into the character of the neighborhood. The proposed street width would be consistent with the local usage and surrounding neighboring roads (i.e., Cliffridge).
The comment regarding the contents of the Design Manual does not raise an issue relating to the substance or adequacy of the EIR. No further response is required.

The redesign of the cul-de-sac is shown in Final EIR Figure 3-4. As shown therein, the road connection between Cliffridge Avenue and La Jolla Scenic Drive North would remain.

The purpose of the street vacation and redesign of the cul-de-sac would be to provide a bikeway, pedestrian path, and a landscaped entryway into residential streets from the intersection of Torrey Pines and La Jolla Village Drive. This would visually enhance the entrance into the neighborhood.

The ROW vacation is a separate action than the street vacation associated with the elimination of the cul-de-sac. See EIR Section 3.3.1. The project requires the ROW vacation to assure that all relevant City regulations are met relating to design of the project.

As detailed in EIR Section 3.4.2.1 there would be a total of three signs on the project site: two bike path signs designed in accordance with the LJSPD signage guidelines would be installed at the north and south ends of the proposed bike path and one entrance sign located on a retaining wall. The entrance sign would be placed on a newly constructed wall and would not result in additional walls.

The signs are currently anticipated to say the lead donor’s name, followed by “Hillel Center for Jewish Life.” The signs would not include “UCSD.”

The entrance sign would be located at the pedestrian entrance of La Jolla Village Drive and would be legible from the street.

The referenced text was removed within the recirculated EIR (December 2013).
<table>
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| AT-138 | 1. Is the site zoned for residential or institutional use?  
2. This list details many activities that appear to be targeted toward uses that are similar to those of institutional use. Are there any uses that are targeted toward residential use?  
3. Will the facility be open to the general public or is it strictly for student use? Where is this stated anywhere in the document?  
4. Given that this paragraph is under the heading “Compatibility with Surrounding Land Uses” and that the proposed facility is separated from institutional use both by designated use on zoning maps and by a major roadway, how are such uses found to be compatible with single-family residential?  

*Based on the site of the facility and the hours of operation, the activities would not result in significant direct or secondary environmental effects.* |

AT-139 | Other than listing some of the potential uses in the previous sentences, is there any discussion in this section that actually establishes compatibility of use?  
2. Where in this section is there any discussion related to hours of operation? What specifically are the hours of operation?  
3. How can any conclusions be drawn in this regard?  

“In addition to the on-site staff, students would be at the facility, mostly during daytime and evening hours, the HCU would operate Monday-Friday, 9:00 A.M. to 9:00 P.M. and as needed on weekends. Therefore, impacts would be less than significant.” |

AT-140 | There is no causal relationship between these two sentences. Please explain how student use throughout the day and well into the evening hours would not contrast with the quiet residential use of families.  

4.1-16 Paragraph 2: “The Existing with Improvements option involves the permanent use of the Cliffridge property for religious uses, which is an allowable use.” |

AT-141a | 1. Is any other type of office use a permitted use under the La Jolla Shores PDO?  
2. Would any other type of use incompatible with residential—such as retail (say, a purveyor of religious books) or industrial (for example, the mass production of wooden crosses)—be allowed if for a religious use?  
3. Why is one use, religious, able to be used to justify permission when other, incompatible uses, are not? What makes it supreme relative to other uses?  
4. If the focus is on the purpose or intent of the use, why isn’t such reasoning carried to its logical conclusion: that religious uses are permitted in the residential zone for the purpose of serving the residents—without discrimination—of that zone?  
5. What level of the City (staff, legislature, executive, legal) is authorized to interpret purpose? Why is such an interpretation made here?  

*Therefore, the Existing with Improvements option would be consistent with the zoning of the LJSPD.* |

AT-142 | 1. Has the project met all requirements of the applicable provision of the La Jolla Shores PDO? Where is the discussion regarding the Conditional Use Permit? |

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| AT-138 | As stated in EIR Section 2.5.4.1, the project site lies within the single-family zone of the LJSPDO. The project does not propose a residential use.  

Programming at the facility would be geared towards Jewish student use; however, it would be open to the public.  

The proposed use is allowed within the project site. See response to comment AT-46. |

AT-139 | As an allowed use, the project self-limits its activities and hours of operation to assure compatibility with the neighborhood and to avoid potentially significant impacts. See response to comment AT-38a. |

AT-140 | This discussion has been revised in Section 4.1.4.1 of the recirculated EIR (December 2013). See the response to comment AT-142 above. |

AT-141a | The Existing with Improvements Alternative would allow the ongoing religious use of the Cliffridge property. It would not create an office use. Future project approvals would be subject to individual review for compliance with all relevant land use and zoning regulations.  

The LJSPDO does not state that religious uses must serve the residents of the zone in which it is located. |

AT-141b | The project is an allowable use under the LJSPDO. See response to comment AT-46.  

The LJSPDO does not state that religious uses must serve the residents of the zone in which it is located. |

AT-141c | The Development Services Department staff has the responsibility to assure that the project conforms to all City regulations and has the authority to make recommendations relating to approval to the decisions makers. |

AT-142 | The project has been deemed to be in conformance the LJSPD Ordinance. A Conditional Use Permit is not required for the proposed project. |
AT-143 The Development Services Department staff has the responsibility to assure that the project conforms to all City regulations, including required parking.

With respect to parking numbers, see response to comment AT-45.

AT-144 As detailed in EIR Section 9.2.1, the hours of operation for the Existing with Improvements Alternative would be similar to those for the proposed project.

The project does not propose residential uses. The proposed use is allowed within the project site. See response to comment AT-46.

The building would be available for limited public use.

AT-145 A Conditional Use Permit is not required for the project. See response to comment AT-46.

AT-146 A Conditional Use Permit is not required for the project. See response to comment AT-46.

AT-147 Table 4.2-1 has been revised in the Final EIR to clarify that the median of La Jolla Scenic Way is raised.

The standard of practice is to use the existing “on the ground” roadway configuration to analyze a roadway if different than the classification. The City of San Diego Traffic Impact Study Manual shows a capacity of a four-lane road (the number of lanes on La Jolla Scenic Way) to be 15,000 ADT. The 15,000 is not arbitrary. Rather, it is the City of San Diego capacity for a 4-lane road.

The LOS E capacity of a 2-lane roadway would be 10,000 ADT. However, since 4 lanes exist, a capacity of 10,000 ADT would not apply. LOS F would be calculated if a 10,000 capacity (a 2-lane road capacity) was used for this 4-lane roadway.
measured either against their paper classification or their observed widths; results measured against an inconsistent baseline should be considered suspect.

1. Why wasn’t La Jolla Scenic Way analyzed against its street classification like all of the other streets?
2. Where does the arbitrary capacity of 15,000 come from?
3. Based on its street classification (2-Lane Collector, according Page 4.2-1), what is the rated LOS E capacity for La Jolla Scenic Way? To what level of service would this correspond?

4.2-5. Paragraph 1: “Figure 4.2-1 shows the locations, configurations, and controls of the five study area intersections…”

AT-148 Please include discussion regarding the nature of this intersection (number of turn lanes, signal control).

4.2-5. Paragraph 3: “Table 4.2-2 shows the existing study area intersections LOS for the A.M. and P.M. peak hours. These values were calculated using Highway Capacity Manual procedures. As indicated, all study intersections currently operate at an acceptable LOS (LOS D or better).”

AT-149 Is any consideration given to delays caused by intersections outside of this list (for example, delays caused by the intersection of La Jolla Village Drive and Villa La Jolla Drive to the east of the site)?

4.2-6. Paragraph 1: “Based on field observations, there are currently Class II bicycle facilities provided along La Jolla Village Drive and Torrey Pines Road within the study area. However, no bicycle facilities are provided along La Jolla Scenic Way and La Jolla Scenic Drive.”

AT-150 Why are street classifications used in descriptions of nearby street segments while no mention of designations in the Community Plan are included in discussion regarding bicycle networks?
2. Are either La Jolla Scenic Way or La Jolla Scenic Drive North represented as bikeways in the La Jolla Community Plan?
3. Would the proposed project impact or improve either of these designations?

4.2-7. Paragraph 3: “La Jolla Scenic Drive North – A contiguous sidewalk is provided along the south side of La Jolla Scenic Drive North; however, no sidewalk is currently provided along the northerly portion.”

AT-151 Does the sidewalk from the La Jolla Scenic Drive North cul-de-sac currently provide connected pedestrian access to the sidewalk on Torrey Pines Road? If so, please mention this.

4.2-7. Paragraph 5: “In addition, shuttle service is provided to connect the University Town Center (UTC) Transit Center to UCSD via the Superloop on Routes 201 and 202 that runs an average of every 10

AT-148 See EIR Figure 3-1 within the Traffic Impact Analysis (Appendix B to the EIR) for specific details of each intersection.

AT-149 City Standards do not require an analysis of intersections to which a project adds less than 50 peak hour trips. The project would add a maximum of six peak hour trips to the intersections other than those analyzed in the report. Since the list of intersections analyzed in the report is sufficient and analyzing additional intersections is not warranted.

AT-150 La Jolla Scenic Drive North is listed as having a proposed Class 2 bikeway on the La Jolla Community Plan. La Jolla Scenic Way is not listed to have a bikeway. The project generates only 58 ADT and less than 10 peak hour trips and, therefore, would not have a significant impact on the bike designations. The future bicycle network, as set forth in the Bicycle Master Plan is described within the Final EIR.

AT-151 There is pedestrian access to Torrey Pines Road, but no sidewalk currently exists along the northerly portion of La Jolla Scenic Drive North. No revision to the EIR is required.
The SuperLoop serves UCSD students, faculty, and staff and is not an MTS bus route. The nearest stop is located at Gilman Drive and Myers Drive, an approximate 15-minute walk from the project site that would require walking through the UCSD campus, or connecting with the MTS 30 route to the project site.

This paragraph was deleted in the recirculated EIR (December 2013).

The Traffic Impact Analysis was developed in coordination with the City of San Diego Development Services Department, Transportation Division, which reviewed and approved the study.

With respect to determination and analysis of trip generation for the project, as detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.
To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.

See also the response to comment AT-47 for additional information related to the survey used to calculate trip generation rates for the project.

With respect to the current use of the Cliffridge property, see response to comment AT-15f.

Hillel’s 2010 winter program log is detailed in EIR Section 3.4.2.1(a). As shown therein, there were 133 activities held with between less than 10 to 50 students attending (refer to the EIR section for details).

The Final EIR was revised to clarify that activities under the Existing with Improvement Alternative would be consistent with those previously described for the Phase 1/Phase 2 project (see Section 3.4.2.1a). Additionally, revisions were made to clarify the number of programs at the proposed facility, and number of anticipated people to attend.
**LETTER**

| AT-156a | Proximity to campus does not equate to being to being comparable. While this does indeed make them candidates, other factors should include similarity in size, offered programs, surrounding neighborhood uses, and percentage of on- and off-campus housing. |
| AT-156b | Please note that while the Traffic Impact Analysis report mentions that the survey data is contained in Appendix F of the report, the appendices were not made available on-line and, thus, I was unable to verify the data for myself. |
| AT-157 | 1. Why was CSUN omitted from the student survey list? Conversely, why was CSUN included in the parking survey? 2. Why wasn't the Hillel facility closest to the proposed project site (San Diego State University) included in the survey? |

4.2-b. Paragraph 3: “A historical monthly program guide was provided by the applicant indicating the dates and times of the social events. Shabbat services typically held on Friday evenings are held on campus at the UCSD International Center, and are therefore not included in the trip generation results.”

| AT-158 | 1. Are these trip generation results part of the data collected through the student surveys mentioned in the previous paragraph or is this an independently collected dataset? If a different set was obtained, what was the methodology and sample size used?  |
| AT-159 | 1. Does this mean that 1% of the total number of respondents (5% of the 20%) would carpool? If not, please rephrase. 2. What is the margin of error of this survey? 3. Were these unique visitors or could the survey include results of the same student attending multiple activities and responding to the survey multiple times? 4. Did the survey ask specifically about the proposed site or did it ask generally about an off-site facility? Did it ask questions about possible other off-site locations? |

4.2-b. Paragraph 4: “The UCLA Hillel facility is located approximately the same distance from the university campus as the proposed Hillel.”

| AT-160 | 1. What is the size of the facility? How does this compare with the proposed project? 2. How do the programs offered at this site compare with those planned for the proposed project? 3. How does this facility zoned? What is the nature of the facility zoning? 4. What is the availability of off-site parking, including nearby on-street parking? |

**RESPONSE**

| AT-156a | Appendix P of the Traffic Impact Analysis fully details the location, sizes, as well as similarities and differences between the proposed project and other Hillel facilities in California. Ultimately, the location of the UCLA and UCSB Hillel centers being close to campus were good candidates from which to collect trip generation data. |
| AT-156b | The appendices to the Traffic Impact Analysis within the recirculated DEIR referenced by the commenter (January 2013) were mistakenly omitted. These appendices were included as part of the recirculated DEIR (December 2013). |
| AT-157 | This facility was unable to complete a student survey despite a request to do so. The facility was included as a relatively comparable campus in terms of Hillel activity for purposes of parking. |

The Hillel facility at San Diego State University was not constructed or even contemplated at the time the NOP was issued for the proposed project (2010), and therefore was not included in the surveys conducted. |
| AT-158 | The determination of trip generation was based on the survey results. The survey was completed by the Hillel staff. |
| AT-159 | The parking surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. |
| AT-160 | The parking surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. See response to comment AT-45 for details on the calculation of parking. |

The specific details asked within this comment relate to land uses and zoning within the City of Los Angeles. These comments do not raise an issue related to the content or adequacy of the EIR.
The parking surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. See response to comment AT-45 for details on the calculation of parking.

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The specific details asked within this comment relate to land uses and zoning within the City of Santa Barbara. These comments do not raise an issue related to the content or adequacy of the EIR.
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<td>AT-166</td>
<td>From the numbers provided, this suggests that calculations derived only from the UCSB survey could vary by as much as 66.7% ([maximum observed usage - average predicted usage] / average predicted usage) = (20 - (6 staff+6 students)) / (6 staff+6 students) = 8/12 = 66.7%. Is this a fair interpretation?</td>
</tr>
<tr>
<td>AT-167</td>
<td>What is the zoning for this facility? What is the nature of the surrounding residential use (SFR, etc.?) What is the availability of off-site parking, including nearby on-street parking? Is the parking at the CSUN facility controlled in any way (gates, etc.)?</td>
</tr>
<tr>
<td>AT-168</td>
<td>The facility reserves 23 of the 40 spaces to be sold to students on a permitted basis by semester or for the entire academic year.</td>
</tr>
<tr>
<td>AT-169</td>
<td>How many “free” parking spaces were observed to be occupied? Are there any plans for the proposed project to charge affiliated students for parking?</td>
</tr>
<tr>
<td>AT-170</td>
<td>This conclusion is not supported by the evidence presented: it merely suggests that the rate charged is too high for the market to bear. Please correct. Students are famously averse to paid parking. Could this be a reason for the parking to be underutilized? Would the parking at the proposed facility be released to non-Hillel related vehicles as if it were a paid-parking facility? Is a public, paid-parking facility a permitted use for the proposed site? What restrictions, if any, can be enacted to prevent a similar use at the proposed facility? Could it be placed as a condition in the Conditional Use Permit?</td>
</tr>
<tr>
<td>AT-171</td>
<td>This paragraph was revised in the Final EIR to clarify the number of programs which could occur simultaneously and the effect on occupancy at the project site. Section 3.4.2.1(b) was revised in the Final EIR to clarify the allowable occupancy at special events and when a Parking Management Plan would be triggered to accommodate these occasions.</td>
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<td>LETTER</td>
<td>RESPONSE</td>
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<td>“However, for the purpose of being conservative in the trip generation assumptions for this report, a maximum of 100 persons were assumed to arrive at the student center during the peak timeframe of programs and events at the facility, which would be expected to occur midday between 10:00 a.m. and 2:00 p.m.”</td>
<td>This is a conservative estimate, as there would rarely be this many trips to the site on a daily basis, as detailed in EIR Section 3.4.2.1(b).</td>
</tr>
<tr>
<td>AT-172</td>
<td>Given the statement referenced above from Section 3.4.2.1(b), this does not appear to be conservative at all. Please rephrase.</td>
</tr>
<tr>
<td>AT-173</td>
<td>1. Was this guide provided with this environmental document? Where is it?</td>
</tr>
<tr>
<td>The hours of operations proposed are between 9:00 a.m. and 10:00 P.M. Monday through Friday.</td>
<td>AT-174</td>
</tr>
<tr>
<td>AT-174</td>
<td>1. What about the few activities held earlier than 9 a.m. alluded to in Section 3.4.2.1(b), which says, “Therefore, most activities would not occur during the typical A.M. and P.M. peak hours (7:00 A.M. to 9:00 A.M. and 4:00 P.M. to 6:00 P.M.)”?</td>
</tr>
<tr>
<td>AT-175</td>
<td>1. What about other large gatherings, such as concerts, high-holiday services, and distinguished speaker events?</td>
</tr>
<tr>
<td>AT-176</td>
<td>1. Are 80 percent walking or are 80 percent driving?</td>
</tr>
<tr>
<td>2. Why is it proper to assume two persons per vehicle for 100 percent (or even 60 percent) of vehicles driving to the site when the sample size is so small (and potential margin of error is so high)?</td>
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<td>LETTER</td>
<td>RESPONSE</td>
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<tr>
<td>AT-178</td>
<td>There is a raised median along La Jolla Scenic Way that would prevent left turns in or out of the project site driveway.</td>
</tr>
<tr>
<td>AT-179</td>
<td>The Final EIR has been revised to remove the language discussing the installation of the stop sign. The installation of a stop sign at the corner of Caminito Deso and La Jolla Scenic Drive North is not part of the project. The traffic impact includes volumes within this neighborhood utilizing Caminito Deso.</td>
</tr>
<tr>
<td>AT-180</td>
<td>The Final EIR was revised to clarify that the Existing plus Project scenario was provided as an additional level of analysis of the potential traffic impacts associated with the proposed project. Specifically, this scenario assumes that the project is constructed and operational under additional traffic conditions (that is without anticipated or proposed road improvements). As discussed in EIR Section 4.2.3.2(a), under this scenario all impacts would be less than significant.</td>
</tr>
<tr>
<td>AT-181</td>
<td>It would be included on the list if an inaccurate 10,000 ADT (2-lane) capacity was used to analyze this 4-lane road.</td>
</tr>
<tr>
<td>AT-182</td>
<td>The volume over capacity increase would be less than 0.02 second, even if a capacity of 8,000 was utilized.</td>
</tr>
<tr>
<td>AT-183</td>
<td>The data is included in the intersection computer analysis which can be found in Appendices D, J, and K to the Traffic Impact Study (EIR Appendix B).</td>
</tr>
</tbody>
</table>

**4.2-12. Paragraph 3:** “Access to the vacant site associated with Phase 2 would be provided by a right-in/right-out driveway on La Jolla Scenic Way.”

1. Why would no left turns be allowed?

“In addition, Phase 1/Phase 2 would be conditioned to install a stop sign on the Caminito Deseo approach to this intersection.”

**4.2-12. Paragraph 4:** “An “existing plus project” analysis has been provided for the Phase 1/Phase 2 traffic in response to the recent case of Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council [2030] to ensure that the traffic study includes an analysis of the existing plus project condition without assuming either additional cumulative projects or additional road improvements in the baseline condition.”

**4.2-16. Paragraph 1:** “As seen in Table 4.2-5, the following study area segments are calculated to operate at LOS E or F with the addition of Phase 1/Phase 2 traffic:
- La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way – LOS E
- Torrey Pines Road between La Jolla Village Drive and Glenbrook Way – LOS E”

1. If La Jolla Scenic Way were to be analyzed using the LOS capacity appropriate to its street classification (rather than the arbitrarily determined 15,000), would it be included on this list?

**4.2-16. Paragraph 2:** “The volume to capacity (V/C) increase due to the project at these two street segments would not exceed the 0.02 threshold.”

1. What would the V/C delta be for La Jolla Scenic Way if analyzed with its street classification LOS capacity?

**4.2-16. Paragraph 3:** “Since many students currently walk to/from the UCSD campus utilizing the intersections of La Jolla Village Drive / Torrey Pines Road and La Jolla Village Drive / La Jolla Scenic Way, the number of pedestrians collected in the peak hour intersection count data were included in the peak hour analysis.”

1. Table 4.2-6 does not appear to include any pedestrian-specific data. How is this pedestrian data represented? Where?
**LETTER**

| AT-184 | The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

There are no additional projects known to be proposed adjacent to the Venter Institute. The Venter Institute is the only project that was approved for the site. |
| AT-185 | The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition. |
| AT-186 | Please see response to comment AT-184. |
| AT-187 | See response to comment AT-184. |
| AT-188 | See response to comment AT-188. |

**RESPONSE**

| AT-184 |
| 4.2-20, Paragraph 4: “4. UCSD Long Range Development Plan (LRDP) includes several on-campus projects which could be constructed and occupied by the time the project would come online in 2015/2016:
  a. Clinical and Technical Research Institute (CTR) located on the UCSD East Campus Medical Center in the Health Sciences Neighborhood proposes construction of a 360,000 gross square-foot building with 2,880 ADT.
  b. East Campus Red Tower project proposes to expand the existing Thornton Hospital which would generate 4,200 ADT.
  c. Saludio Cardiovascular Center is constructed and generates approximately 633 ADT.
  d. East Campus Office Building is currently under construction and would generate approximately 457 ADT.” |

1. Why was the Venter Institute, currently under construction across Torrey Pines Road from the Clifford property, omitted from this list?
2. Three other projects are anticipated to be developed next to the Venter site. What is the timeframe for these projects and should they be included in the Near-Term forecast?

| AT-185 |

4.2-20, Paragraph 5: “Figure 4.2-6 shows the near-term ADT volumes (those from the approved/pending projects added to existing ADT volumes). Table 4.2-7 shows the street segment US for the existing plus near-term traffic scenario.”

1. How would the inclusion of the Venter Institute, which will only utilize a right-in/right-out driveway along Torrey Pines Road, affect the traffic patterns?
2. Since Torrey Pines Road is shown to currently operate at LOS E, would it be unreasonable to expect outbound traffic from the Venter site seeking to use La Jolla Village Drive to use Glencrook Way/Glencrook Avenue/La Jolla Scenic Drive North, La Jolla Scenic Way as a way to avoid making a U-Turn at Torrey Pines Road/Glencrook Way and have to face further congestion?

"Under the near-term without project scenario (left half of table), the following segments are calculated to operate at LOS E or F without the project,..."

| AT-186 |

- Please refer to Question 1 for 4.2-16, Paragraph 1. |

| AT-187 |

4.2-23, Paragraph 2: “As shown in the table, the following segments are calculated to operate at LOS E or F with the near-term traffic and with Phase 1/Phase 2,...”

- Please refer to Question 1 for 4.2-16, Paragraph 1. |

| AT-188 |

4.2-23, Paragraph 4: “As shown, all key signalized intersections are calculated to operate at LOS D or better.”

1. How might this be affected by the inclusion of the Venter project?
Under the “all walk” scenario, the project would not add any vehicle trips to the roadway system. EIR Figure 4.2-2 accurately represents this scenario. The “all walk” scenario was analyzed at the request of the City of San Diego due to prior community comments regarding the large amount of pedestrian activity which occurs at the La Jolla Scenic Way/La Jolla Village Drive intersection.

A 50-50 scenario and a 100 percent drive scenario was not completed in the EIR. The 100 percent scenario was not considered reasonable to occur due to the subject facility being directly across from the UCSD campus. However, a 100 percent drive scenario was analyzed in response to comments and the results are shown in Attachment 2. No significant impacts to the circulation system would occur under this scenario.

Projects throughout the La Jolla community that are not currently built were assumed to be built per the Community Plan designation in the Year 2030 analysis.

SANDAG defines “residential recreation” as active neighborhood parks that are for the use of residents only, such as fenced-in areas that may contain pools, tennis courts, etc.

See response to comment AT-184.

See response to comment AT-184.

Under the Existing with Improvements Alternative Hillel would permanently use the Cliffridge property. Under the Phase 1/Phase 2 project, the use of the property would be temporary until occupancy permits are issued for the Phase 2 buildings.

The Traffic Impact Analysis prepared for the project adequately analyzed the Phase 1/Phase 2 project and the Existing with Improvements Alternative (see EIR Appendix B).

The Existing with Improvements Alternative provides an alternative project to the Phase 1/Phase 2 project which would result in permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the Municipal Code.
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<th>RESPONSE</th>
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<tr>
<td>AT-194b</td>
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<td>Under CEQA, a public agency must determine what, if any, effect on the environment a proposed project may have. To do so, a public agency must first make a fair assessment of existing physical conditions (i.e., baseline physical conditions when the NOP was issued) and then compare it to the anticipated or expected physical conditions if the project were to be completed. This allows the agency to focus on the nature and degree of changes expected in those physical conditions after the project and whether those changes result in any significant effect on the existing environment (CEQA Guidelines §15125). The NOP for the project was released in 2010, at which time Hillel was using the Cliffridge property.</td>
</tr>
<tr>
<td>As detailed in EIR Section 9.2.1, there is a less than significant change in the delay and volume over capacity ratio when comparing the Existing with Improvements Alternative to the baseline conditions of the project site.</td>
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RTC-589
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<th>LETTER</th>
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<tr>
<td><strong>AT-195</strong></td>
<td>The volume over capacity increase would be less than 0.02 second even if a capacity of 8,000 was utilized.</td>
</tr>
<tr>
<td>AT-196</td>
<td>The capacity of La Jolla Scenic Way is independent of the stop sign at Caminito Deseo.</td>
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<tr>
<td>AT-197</td>
<td>See response to comment AT-187.</td>
</tr>
<tr>
<td>AT-198</td>
<td>See response to comment AT-197.</td>
</tr>
<tr>
<td>AT-199</td>
<td>Please see the response to comment AT-47 for comments related to trip generation.</td>
</tr>
<tr>
<td>AT-200</td>
<td>The project is not a mixed-use, but rather an allowed use at this location. See response to comment AT-46. With respect to the project’s parking numbers, see the response to comment AT-45.</td>
</tr>
</tbody>
</table>
LETTER

2. Doesn't the Municipal Code provide specific parking regulations for religious use?
3. If the facility does not match a use described by the Municipal Code, isn’t it standard practice to apply a similar use? Why was this not done?
4. Doesn't the La Jolla Shores PDO require the similar use rule to be applied where ambiguity exists regarding off-site parking requirements?
5. Given the variety of uses listed in Section 3.4.2, "Proposed Uses," would it not be proper to consider the proposed use of Phase 2 as mixed use if religious is not the declared use?
6. Doesn't the La Jolla Shores PDO require that minimum parking requirements be totaled for each use when two or more uses exist?

The project would be required to comply with the parking regulations, but that in this case a deviation is being requested.

AT-203

1. Section 4.2.4.1(a) states, "Of the 20 percent that suggested they would drive to the facility, approximately 5 percent of those students responded that they would carpool." Using this statement as it is currently worded, wouldn't the math work out as: 50 x .2 x .05 = .5 (rounded to 1 trip)?
2. If the statement from Section 4.2.4.1(a) was actually supposed to mean a total of 5% respondents would carpool, shouldn't the math work out as: 50 x .05 = 2.5 (rounded to 3 trips)?
3. Where does half (50 percent) of driving students carpooling come from?

"If the same transportation mode split percentages are applied to 100 students, only 10 spaces would be necessary to accommodate student patrons (assuming all 100 students are on-site at one time). An additional seven spaces for staff would necessitate 17 spaces, well below the 27 spaces proposed as part of the project."

RESPONSE

AT-201 See responses to comments AT-28 and AT-45.

AT-202 See response to comment AT-162.

The project would be required to comply with the parking regulations, but that in this case a deviation is being requested.

AT-203 The percentage of drivers who stated they would carpool is 56 percent. The typo in Section 4.2.4.1(o) has been corrected. Using a 50 percent carpool rate, the math in the paragraph cited in the comment is correct. The 56 percent carpool percentage was obtained from the UCSD survey of 115 students.

AT-204 As stated in response AT-206, the 5 percent carpool percentage is not valid. The actual carpool percentage is 56 percent, based on student surveys and therefore, the o within the comment is inaccurate. The 37 space calculation in number 2 is also inaccurate since it relies on the incorrect carpool percentage.
Different locations use different names; however, all the Hillel facilities offer similar programs and are intended to provide primarily religious opportunities. It is up to the individual facilities to determine what name to use as a means to promote their programs.

All cities have their own municipal codes and use regulations. A student center would not be an allowable use in a residential zone under the LJSPDO. It is beyond the scope of this CEQA review to determine the zoning in the city of Los Angeles. The study using other Hillel facilities, including the one within close proximity to UCLA, was used as a basis for program planning and parking.

The specific details asked within this comment relate to land uses and zoning within the city of Los Angeles. These comments do not raise an issue related to the content or adequacy of the EIR.

Because the project type does not fit into a specific category for parking determination, the survey was intended to compare activities and parking at a similar facility in order to assess the reasonable requirements of the proposed project. The surrounding land uses would not be relevant to this task.
4.2-34. Paragraph 3: “The CSUN Hillel Student Center also provides adequate parking with 40 parking spaces, some of which are sold to students on a permitted basis.”

**AT-209**
1. Given the differences between the CSUN site and the proposed project, what does this have to do with the minimum parking requirements for the proposed project?

4.2-34. Paragraph 4: “The average parking rate for California Hillel student centers is 3.9 spaces per 1,000 square feet, and the average parking rate for all centers across the country is 1.3 spaces per 1,000 square feet. The parking rate for the facility is 3.7 spaces per 1,000 square feet. Comparable average rates are lower than that for the project.”

**AT-210**
1. Does this mean that all other factors (type of programming provided, surrounding neighborhood uses, proximity to student housing and other student-oriented services, availability of nearby off-site or on-street parking, etc.) are the same for every other student center as they are for the proposed project?

“Based on information provided for similar California university Hillel facilities and based on average parking rates for Hillel student centers across the country, it can be reasonably estimated that the 27 parking spaces proposed for the project would be adequate to serve Phase 1/Phase 2, and impacts to parking would be less than significant.”

**AT-211**
1. Can this conclusion reasonably be reached when the calculations presented on page 4.2-33, Paragraph 5, may be incorrect?
2. Can this conclusion reasonably be reached when similarity to other facilities is based on only some factors while other significant factors are ignored?
3. How was the final number of 27 spaces actually decided upon?

4.2-34. Paragraph 5: “There are currently seven parking spaces on La Jolla Scenic Drive North.”

**AT-212**
1. A rough estimate of parkable curb, using Google Maps and assigning 20 feet per parallel space yields 28-30 parking spaces [17-18 along the north curb, 1 on the south curb in the cul-de-sac, and 10-11 along the south curb] along the section of La Jolla Scenic Drive North faced by the proposed project. While this is just a rough estimate, it certainly is more than 7. Where does this figure come from?

“The design and site plan of Phase 1/Phase 2, including the street vacation, would provide two parking spaces in this area.”

**AT-213**
1. Where, precisely, would these two additional on-street spaces be located? Certainly not the acute curve created by vacating the cul-de-sac? Wouldn’t parking spaces here create safety issues related to turn width and sight distance from the egress of the bicycle path?

“This would result in a loss of five on-site parking spaces.”

**AT-214**
1. Perhaps the first line of the paragraph should be rewritten to state that the project would eliminate 7 parking spaces...?

AT-209  See response to comment AT-211.

AT-210  See response to comment AT-45.

AT-211  See responses to comments AT-207 and AT-45.

AR-212  This information was corrected in the recirculated EIR (December 2013) to reflect that La Jolla Scenic Way had seven parking spaces, not La Jolla Scenic Drive North.

AT-213  Section 4.2.5.1 of the recirculated EIR (December 2013) was revised to clarify that the reconfigured road, after approval of the street vacation, would curve into Cliffridge Drive. The curve would not be “acute” and would be in accordance with City standards. The proposed pathway would be used by recreational cyclists and would not create any safety issues (see EIR Section 4.2.5.1).

AT-214  Section 4.2.4.1 of the recirculated DEIR (December 2013) was revised to clarify that seven on-street parking spaces would be lost from the street vacation.
LETTER

“Although the project would decrease street parking by eight spaces, the project is designed to fully accommodate staff and student parking on-site, thus decreasing a current demand for street parking.”

AT-215  1. How can the project decrease current demand when the demand created by the project does not yet exist?
2. How can the cliffridge property be counted as creating current demand when the property’s temporary use is predicated on the application process for the very project for which it purports to serve as a baseline?
3. Shouldn’t the current parking demand be considered as the demand created by the Cliffridge property under single-family use? If not, why not?

“Given the provision of ample bicycle parking and the sitting of the facility proximate to the campus, sidewalks, and walking paths, impacts from the loss of eight spaces would be less than significant.”

AT-216  1. What is considered “ample” bicycle parking?
2. How can the inclusion of bicycle parking be considered an offset for the loss of motor-vehicle parking?
3. How can proximity of a site location be considered an offset for the loss of on-street parking?
4. Is it wise to eliminate any available parking (including on-street parking) in a Parking Impact Overlay Zone?

4.2.35, Paragraph 1: “There would be no increase in the number of staff or activities at this location. Thus, no increase in parking would be required, and impacts related to parking would be less than significant.”

AT-217  • Please refer to Questions 1-5 for 4.2-32, Paragraph 1.

4.2.35, Paragraph 2: “Based on the calculated parking need, Phase 1/Phase 2 would provide adequate parking for the facility. Therefore, impacts to parking would be less than significant.”

AT-218  • Please re-assess, considering the potential for biased data through oversampling, an unknown margin of error, the lack of similarity references, mathematical inconsistencies, and insufficient details to justify this conclusion.

4.2.35, Paragraph 3: “There would be no increase in the number of staff or activities at this location. Thus, no increase in parking would be required, and impacts related to parking would be less than significant.”

AT-219  • Please refer to Questions 1-5 for 4.2-32, Paragraph 1.

4.2.35, Paragraph 7: “During Phase 1, a temporary sidewalk connecting La Jolla Village Drive to La Jolla Scenic Drive North would be constructed. In addition, a new pedestrian curb ramp would be constructed on Cliffridge Avenue. These improvements would ensure that traffic hazard impacts would be less than significant.”

RESPONSE

AT-215  This paragraph was removed from the recirculated EIR (December 2013).

AT-216  Space has been set side that will accommodate three bicycle spaces and three bicycle lockers.

The bicycle parking is not an offset for parking. It is in addition to the proposed parking.

Bicycle parking is not an offset for loss of on-street parking. With respect to the elimination of off-street parking, the construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

AT-217  See response to comment AT-197.


AT-219  See response to comment AT-197.
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<tr>
<td>AT-220</td>
<td>The availability of a temporary sidewalk and pedestrian ramp would allow pedestrians and bicyclists to use this connection during construction. These improvements would allow pedestrians and bicyclists to remain safely off the streets. As discussed in EIR Section 4.2.5.1(a), pedestrian access to Phase 1/Phase 2 is planned via a non-contiguous sidewalk encompassing the facility with the primary walkway into the facility being located off La Jolla Village Drive. This location was chosen to provide a safer route into the center than through the driveway where cars will be maneuvering in and out, and since the crosswalks from the UCSD campus along La Jolla Village Drive are located on both ends of the walkway.</td>
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<td>AT-221</td>
<td>The volumes are higher on La Jolla Scenic Way (10,000 ADT) versus La Jolla Scenic Drive North (1,300 ADT). However, La Jolla Scenic Way is a 4-lane road with plenty of capacity. Since La Jolla Scenic Drive North serves residential uses, it is prudent to put the driveway on the classified road and not a residential road. Access to the project is provided on La Jolla Scenic Way, rather than La Jolla Scenic Drive North, to prevent conflicts with driveways serving residences located on La Jolla Scenic Drive North.</td>
</tr>
<tr>
<td>AT-222a</td>
<td>See response to comment AT-77d.</td>
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<tr>
<td>AT-222b</td>
<td>The difference in elevation is approximately 20 feet. Westbound left-turning vehicles at the La Jolla Village Drive/La Jolla Scenic Way intersection are visible from the project driveway. Therefore, discussing the elevation difference was not relevant. The slope of a road affects the speed vehicles travel on a roadway.</td>
</tr>
<tr>
<td>AT-222c</td>
<td>Sight distance analysis. Given the elevation difference drivers egressing the site can see the left-turning vehicles. In addition, the line of sight is adequate once the left-turning vehicle begins the left turn.</td>
</tr>
<tr>
<td>AT-222d</td>
<td>An evaluation of the actual existing conditions at the La Jolla Village Drive/La Jolla Scenic Way intersection, including those mentioned in the comment was accounted for in determining the speed of vehicles making the eastbound to southbound right turn. It was concluded that drivers would be driving less than 30 mph; 200 feet of sight distance is needed at 30 mph.</td>
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</table>
AT-222e As the parking would accommodate use of the facility, queuing is not expected to occur.

AT-223 This comment does not raise any issues related to the substance or adequacy of the EIR. No further response is required.

AT-224 A peak hour level of service (LOS) analysis of the project driveway at La Jolla Scenic Way shows LOS A/B operations for the outbound movement. This indicates that there would be plenty of gaps in traffic during peak hours for existing traffic.

With respect to site distance at the project driveway, See response to comment AT-77d.

AT-225 See response to comment AT-182.
No sidewalk currently exists on the north side of La Jolla Scenic Drive North. The project would construct a 12-foot landscaped parkway which would improve the pedestrian and bicycle routes by providing a safe place to walk/ride.

The Bicycle Master Plan Update (City of San Diego 2013), which sets forth the planned bicycle network in the City, does not designate this roadway a Class II Bikeway.

With respect to potential safety issues associated with the proposed path, see response to comment AT-53b.

This information is included in the Project Description under Section 3.4.3 which states the following:

Pedestrian access to Phase 1/Phase 2 is planned via a non-contiguous primary walkway into the facility would be from a pedestrian path entry at La Jolla Village Drive.

The proposed pedestrian ramp would improve pedestrian and bicycle circulation. See response to comment AT-53b.

Even if the new pedestrian ramp was not constructed, a project generating only 58 ADT and 8 peak hour trips would not significantly impact pedestrians, motor vehicles or bicycles.

With respect to site distance at the project driveway, see the response to comment AT-77d. No queuing issues entering the parking lot are expected with a peak hour maximum entering of vehicles of seven, one about every nine minutes.

With respect to the proposed stop sign at the La Jolla Scenic North/Caminito Deseo intersections, see response to comment AT-182.

This conclusion is that the impact would be less than significant, which is an accurate description of the outcome. No revisions to the Final EIR are required.
LETTER

The EIR misidentified the trees on-site as Torrey pines. The Biological Survey is correct in their identification as ornamental pines. The recirculated DEIR (December 2013) was revised to clarify that the trees on-site are ornamental pines, not Torrey pines.

The bird species listed were those present when the biological surveys were conducted, including the most recent in July 2016. No raptors were identified. However, as detailed in EIR Section 4.3, although no raptors were present during the surveys, the project site is noted to contain trees that may support nesting raptors.

Specifically, EIR Section 4.3.3.2 (a) states the following:

Cooper’s hawk is a CDFW species of special concern that could potentially occur on or adjacent to the project site. Because clearing and construction activities associated with Phase 1/Phase 2 could be disruptive to raptors including Cooper’s hawk and breeding or nesting birds, direct and indirect construction project impacts would be significant.

EIR Section 4.3.3.3(a) then identifies mitigation to reduce potential impacts to nesting raptors to a less than significant level.

As detailed in the EIR, biological surveys were conducted that did not identify wildlife species that are sensitive pursuant to multiple regulations. Therefore, additional surveys would not be required.

Other than the nesting raptors (detailed above in response to comment AT-235), EIR Section 4.3.1.4(c) states as follows:

All sensitive wildlife species known to occur in the project vicinity (within 2 miles of the survey area) that are federally listed threatened or endangered are not expected to occur due to the lack of suitable habitat.

Therefore, it is determined that the project would have less than significant impacts on sensitive wildlife species (not including nesting raptors).

RESPONSE

AT-231

1. Why are the ornamental pines referred to as Torrey pines in other sections of this document?
2. If these two pines are, indeed, of the Torrey species, why are they not identified as such?
3. If these pines are, indeed, Torrey pines, and the Biological Survey does not properly identify them, couldn’t other information provided by this report, including conclusions, be considered suspect?

4.3.2. Paragraph 1: “Bird species detected on-site were California towhee (Pipilo crissalis), house finch (Carpodacus mexicanus frontalis), Anna’s hummingbird (Calypte anna), northern mockingbird (Mimus polyglottos polyglottos), and yellow-rumped warbler (Dendroica coronata).”

AT-232

- Residents in the vicinity (within 500 feet) have reported seeing raptors such as hawks, falcons, and owls.

4.3.2. Paragraph 2: “No mammals were observed onsite.”

AT-233

- Wild, untamed mammals that have been witnessed by residents in the vicinity of the site (within 500 feet) include rabbits, opossums, raccoons, and coyotes.

1. Since wildlife has a tendency to roam, were any surveys conducted in the surrounding neighborhoods?

4.3.3. Paragraph 6: “Cooper’s hawk, a sensitive raptor species recognized by CDFW, and migratory and breeding birds have potential to nest on and adjacent to the project site.”

AT-234

- Please see comment for 4.3-2, Paragraph 1.

4.3.7. Paragraph 2: “Although no sensitive wildlife species were detected that would be directly impacted by project activities, there is a potential for raptors, including Cooper’s hawk, to nest in large eucalyptus trees in and adjacent to the project area.”

AT-235

- Please see comment for 4.3-2, Paragraph 1.
- Please see comment for 4.3-2, Paragraph 2.

4.3.8. Paragraph 4: “If active raptor nests are detected, the report shall include mitigation in conformance with the City’s Biology Guidelines (i.e. appropriate buffers, monitoring schedules, etc.) to the satisfaction of the ADO of the Entitlements Division.”

AT-236

1. What is the “ADD of the Entitlements Division?” What authority does this carry?

AT-234

See the response to comment AT-235.

AT-235

See the response to comment AT-235.
The “ADD” is an acronym for the Assistant Deputy Director. The individual in this position is responsible for ensuring that mitigation is implemented as required.

As stated in the EIR, standard engineering design for proper surface drainage of irrigation and rainwater, and subsurface drainage structures if necessary, would be required for construction of the project.

A geologic reconnaissance was performed on the project site in 2011, which is suitable to determine the existing geological conditions of the site. As detailed in EIR Section 4.4.3.1(a), the geologic reconnaissance concluded that the project site would be suitable for the construction of the project. A detailed geotechnical investigation is typically required by the City prior to the issuance of a grading permit. At that time site-specific recommendations would be made, if needed, and would become conditions of the grading permit.

Information has been added to the Final EIR to clarify that energy consumption rates specific to a religious facility of this type were not available. For the purposes of this analysis, it was assumed that the energy consumption for Phase 1/Phase 2 was based on educational uses because it is the closest available data type use to the proposed use.

The estimate is adequately based on the solar energy analysis conducted as part of the project. As detailed in EIR Section 4.5.3.1, with the photovoltaic panels, the total electricity consumption would be 30,855 to 43,197 kWh per year. The size of the system would be 29.761 kW (CEC AC Rating).

The Existing with Improvements Alternative would also be required to meet sustainable design standards.

As detailed in the recirculated EIR (December 2013) because there are natural gas consumption rates specific to a religious facility of this type are not available, the analysis was based on office uses because it is the closest available data type use to the proposed use.
LETTER

4.10, Paragraph 4: "Educational/school uses generate approximately 0.0013 ton per square foot per year (CalRecycle 2009)."

AT-243

1. Isn't the declared use of the facility to be primarily religious? Why is educational/school use considered the standard here?

4.11, Paragraph 5: "As the existing WITH Improvement option would not result in expansion of the existing structure or operations, no increases in natural gas consumption, water use, solid waste, or vehicle use would result from the permanent operation at the Cliffridge property."

AT-244

1. Was an Energy Use and Conservation analysis conducted to determine possible increases in natural gas consumption, water use, solid waste, or vehicle use when the Cliffridge property changed from single-family residential use to the "temporary" administrative office use? If not, how can this conclusion be supported?

4.8-9, Paragraph 2: "The City therefore considers an analysis of the GHG emissions that would be generated by Phase 1/Phase 2 to be pertinent."

AT-245

- Please reword this sentence is confusing with a prepositional phrase separating the verb from the conjunctive subject.

4.8-10, Paragraph 2: "Phase 2 would generate 118 ADT (LLG 2011)."

AT-246

1. Does this match the estimates claimed in Section 4.2?

4.8-11, Paragraph 2: "For each GHG source, the land use type most similar to Phase 1/Phase 2 was selected from the available generation rate data."

AT-247

1. Why is this done here, but not in other instances, such as parking requirements?

4.8-15, Paragraph 1: "The Existing WITH Improvement option would not expand or intensify the existing structure, operations, or vehicle traffic."

AT-248

1. Was a Greenhouse Gas analysis conducted to determine possible increases greenhouse gas emissions when the Cliffridge property changed from single-family residential use to the "temporary" administrative office use? If not, how can this conclusion be supported?

4.8-2, Paragraph 4: "Three measurements were made at the project site. Figure 4.8-1 shows the locations of these measurements."

AT-249

1. When (date and time) were these measurements gathered?

RESPONSE

AT-243

As explained in the recirculated EIR (December 2013) because solid waste rates specific to a religious facility of this type are not available, this analysis was based on educational/school uses because they are the closest available data type use to the proposed use.

AT-244

At the time of the NOP, the Cliffridge property was being used by Hillel primarily for religious purposes, and therefore that constitutes the baseline condition.

AT-245

The Final EIR was revised to clarify that the City determined a GHG analysis was necessary.

AT-246

This was revised in the recirculated EIR (December 2013) to match the discussion in EIR Section 4.2.

AT-247

The project would be required to comply with the parking regulations, but in this case a deviation is being requested.

AT-248

See response to comment AT-247.

AT-249

As detailed in the Noise Technical Report (GHG Appendix G), noise measurements were taken at the project site on February 11, 2008.
4.8.5, Paragraph 5: “On-site noise sources would be those associated with typical student activities at the courtyard and patios.”

AT-250
1. Would on-site noise sources also include utility equipment (HVAC, etc.) noises?
2. What is the projected noise level generated by the proposed facility’s utility equipment?
3. Where would this equipment be located?

AT-251
1. Which version of the traffic report is this? The Traffic Impact Analysis provided in Appendix B of this document is dated 2012.

4.10-6, Paragraph 4: “Replacement of the garage and deck with the proposed parking lot would not result in a substantial increase in impervious surfaces.”

AT-252
1. Considering that the back yard comprises approximately 40% of the total square footage of the lot, that the garage and deck comprise approximately 50% of the surface area of the back yard, and that the parking lot is proposed to cover nearly all of the back yard, it is likely that the level of impervious surfaces would increase by approximately 20%? Is this not significant?

4.10-10, Paragraph 2: “The Existing with Improvements option would involve construction of a paved surface parking lot in a location where the garage and deck were once located; thus, there would not be a substantial alteration to on- and off-site drainage patterns.”

AT-253
• Please refer to 4.10-6, Paragraph 4.

AT-254
• Please identify BMP here, rather than at a later point in the paragraph.

4.11-4, Paragraph 4: “To meet water quality requirements, Phase 1/Phase 2 would incorporate LID site design, source control, treatment control, and construction BMPs, as shown in Figure 4.11-1.”

AT-255
1. What is “LID site design?”

AT-250 EIR Section 4.8.3.1 was updated in the recirculated EIR (December 2013) to state noise levels would HVAC units. The noise level of 73 dB(A) Leq at 3 feet for the units on each proposed building was adjusted for the distance and height from the proposed HVAC units to the adjacent residential property lines. Noise reduction provided by the parapet walls were determined first by calculating the Fresnel number and then converting this to an insertion loss. EIR Table 4.8-2 summarizes the HVAC noise levels at each receiver. As shown, HVAC noise levels are not projected to exceed 40 dB(A) Leq at the adjacent residential properties.

The HVACs would be located in three mechanical equipment recessed wells on the roofs.

AT-251 EIR Section 4.8.3.1 was updated in the recirculated DEIR (December 2013), to state the following:

Future (Year 2030) traffic volumes on La Jolla Village Drive, La Jolla Scenic Way, and Torrey Pines Road in the project vicinity were obtained from the traffic report (Appendix B).

AT-252 As stated in the EIR, the replacement of the garage and deck with the proposed parking lot would not result in a substantial increase in impervious surfaces and associated increased runoff. The City’s Significance Determination Thresholds (2011) provides examples of what may represent a significant impact:

If a project would grade, clear, or grub more than 1.0 acre of land, especially into slopes over a 25% grade, and would drain into a sensitive water body or stream there may be significant impacts on stream hydrology if uncontrolled runoff results in erosion and subsequent sedimentation of downstream water bodies.

The Existing with Improvements Alternative involves 2,860 square feet, or 0.06 acre, of construction for the parking lot. This would not represent a significant increase in impervious surfaces. Furthermore, the project would be required to comply with the City storm water regulations that would ensure impacts are less than significant.

AT-253 See response to comment AT-255.
The Final EIR has been updated to reflect the project’s compliance with new City water management regulations. Specifically, EIR Section 4.11 was revised to summarize a new Water Quality Technical Report prepared for this purpose. Lists of BMPs are included throughout the section.

The following paragraph was added to the Final EIR.

Low-impact development (LID) Integrated Management Practices (IMPs) refers to a storm water management approach that aims to mimic a site's predevelopment hydrology by using design techniques that infiltrate, filter, store, evaporate, and detain runoff close to its source.
<table>
<thead>
<tr>
<th>LETTER</th>
<th>RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>AT-256</td>
<td>See response to comment AT-258.</td>
</tr>
<tr>
<td>AT-257</td>
<td>The project does not require a CUP. This agreement is typically executed during construction permit review.</td>
</tr>
<tr>
<td>AT-258</td>
<td>See response to comment AT-255.</td>
</tr>
<tr>
<td>AT-259</td>
<td>This sentence was revised in the recirculated EIR (December 2013) as follows: A single-family home (attached, multiple units) development, built in the mid-1970s, lies across La Jolla Scenic Way to the east.</td>
</tr>
<tr>
<td>AT-260</td>
<td>As required under CEQA Guidelines Section 15125(a): An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published. The NOP was published on October 8, 2010. Therefore, the baseline conditions are adequately described. The lot was undeveloped at the time the NOP was issued. See the response to comment AT-188 for information relating to the Venter Institute as a cumulative project.</td>
</tr>
<tr>
<td>AT-261</td>
<td>The boundaries of the vacant site are shown in the aerial photograph in EIR Figure 2-3. The referenced description, as contained in the EIR, is accurate.</td>
</tr>
<tr>
<td>AT-262</td>
<td>The recirculated EIR (December 2013) was revised to include that the Phase 2 building heights would range from 18 to 28 feet, and would be consistent with the LDC, Coastal Height Overlay Zone, and the Design Manual.</td>
</tr>
</tbody>
</table>
**LETTER**

**AT-263**
1. What is the actual building coverage?

4.12-16, Paragraph 5: "Phase 1/Phase 2 would comply with all other relevant development and design regulations with the exception of one deviation being requested from the LDC."

**AT-264**
1. Why isn't a deviation for parking being requested, considering that the calculations would not comply with requirements set forth in the Municipal Code?
2. Could a chart be prepared showing all applicable design regulations mentioned in Section 4.12.1.3 and the manner in which the proposed project meets these requirements so that compliance is easier to assess?

4.12-17, Paragraph 2: "However, these walls would be less than six feet in height from the proposed grade and would be visually screened with vegetation."

**AT-265**
1. Does this comply with the requirement that walls screening parking lots shall have a height of not less than four feet?

4.12-18, Paragraph 2: "Modifications to the site for the Existing with improvements option would include interior structural upgrades, landscaping, redesign of the driveway to the garage, and construction of a parking lot and a new 24-foot-wide driveway cut on Cliffridge Avenue north of the Cliffridge property."

**AT-266**
1. Wouldn't the garage be demolished? Why is it mentioned here?
2. While the 24-foot width of the driveway is required by the Land Development Code, wouldn't such a width be out of character and scale of the surrounding neighborhood?

4.12-18, Paragraph 3: "The building coverage would be consistent with the LDC and LJSPD and would not exceed 60 percent of the lot."

**AT-267**
1. What would be the actual building coverage?

"The Existing with improvements option would comply with all other relevant development and design regulations with the exception of the deviation being requested from the LDC."

**AT-268**
1. What are the required setbacks with regards to the neighboring residence at 8073 Cliffridge Avenue?
2. What is the effective landscape coverage for the lot with this option?
3. Does the parking lot provide a clearly marked turnaround area at the end of the aisle in accordance with the Land Development Code? Would the lack of one require an additional project deviation?

**RESPONSE**

**AT-263**
The recirculated EIR (December 2013) contained the following additional information:

The proposed lot coverage for Phase 2, with the landscaped area, would be 15.8 percent, and would be consistent with the LDC, LJSPD, and the Design Manual by not exceeding 60 percent of the lot.

**AT-264**
As discussed in the Final EIR, a deviation from parking regulations would be required for the proposed project. See Final EIR Section 3.3.

All of the applicable design regulations are adequately detailed in EIR Section 4.12. Impacts were determined to be less than significant.

**AT-265**
As detailed in EIR Section 3.4.2.1, the walls would be at least four feet in order to screen parking areas, but would not exceed a height of six feet.

**AT-266**
The Final EIR has been revised to clarify that the garage would not be demolished.

The driveway would be relocated to the cul-de-sac. As the driveway would not be adjacent to other residences, the curb cut would not be out of character with the surrounding neighborhood.

**AT-267**
The proposed lot coverage for the Existing with Improvements Alternative would be 27 percent.

**AT-268**
With respect to project setbacks and conformity with the neighborhood, the project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

The effective landscape coverage is 36.7 percent.
The parking lot has a clearly marked turnaround area at the end of the aisle, as specified in the LDC.

The recirculated DEIR (December 2013) was revised to include the following information:

The neighborhood is suburban in character, with one- and two-story single-family residences to the south, one- and two-story single-family attached homes east across La Jolla Scenic Way, and the six-lane La Jolla Village Drive and UCSD Campus to the north, where the La Jolla Playhouses are in a clustered arrangement.

The purpose of this section is to detail the bulk and size of the surrounding land uses with regards to visual aspects. Therefore, this sentence is appropriate in the EIR and does not require further revisions.

The recirculated EIR (December 2013) was revised to include the following information:

This data was obtained from online public records and includes the 12 closest single-family residences facing the project site from the south, and the single-family attached homes to the east.
**LETTER**

**TABLE 4.12-1**
NEIGHBORHOOD BULK AND SCALE SURVEY

<table>
<thead>
<tr>
<th>Unit</th>
<th>Building SF</th>
<th>Lot SF</th>
<th>Bedrooms/Baths</th>
<th>Year Built</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1,740</td>
<td>7,800</td>
<td>3/2</td>
<td>1958</td>
</tr>
<tr>
<td>2</td>
<td>2,338</td>
<td>8,000</td>
<td>3/2</td>
<td>1958</td>
</tr>
<tr>
<td>3</td>
<td>1,817</td>
<td>8,000</td>
<td>3/2</td>
<td>1958*</td>
</tr>
<tr>
<td>4</td>
<td>2,424</td>
<td>8,400</td>
<td>4/3</td>
<td>1968</td>
</tr>
<tr>
<td>5</td>
<td>1,865</td>
<td>8,000</td>
<td>3/2</td>
<td>1958</td>
</tr>
<tr>
<td>6</td>
<td>3,554</td>
<td>9,400</td>
<td>4/4</td>
<td>1980</td>
</tr>
<tr>
<td>7</td>
<td>1,918</td>
<td>10,000</td>
<td>3/2</td>
<td>1961</td>
</tr>
<tr>
<td>8</td>
<td>2,338</td>
<td>9,600</td>
<td>3/2</td>
<td>1962</td>
</tr>
<tr>
<td>9</td>
<td>1,724</td>
<td>8,000</td>
<td>3/2</td>
<td>1960</td>
</tr>
<tr>
<td>10</td>
<td>2,458</td>
<td>8,500</td>
<td>4/3</td>
<td>1982</td>
</tr>
<tr>
<td>11</td>
<td>2,030</td>
<td>8,000</td>
<td>3/2</td>
<td>1961</td>
</tr>
<tr>
<td>12</td>
<td>1,410</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>1,692 Townhome</td>
<td>3/2 or 2.5</td>
<td></td>
<td>1974</td>
</tr>
<tr>
<td>Average</td>
<td>2,273</td>
<td>8,242</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

SF = square feet

* = original owner

**RESPONSE**

AT-272 A footnote was added to row 13 in EIR Table 4.12-1 in the recirculated EIR (December 2013), which reads:

“Two attached, single-family homes considered one structure and one lot area.”

With respect to a survey of setbacks, see response to comment AT-271.

4.12-22, Paragraph 2: “The two-story condonimium and townhome units have shared walls and occur in larger structures composed of two to four units.”
<table>
<thead>
<tr>
<th>LETTER</th>
<th>RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>AT-273</strong></td>
<td>The recirculated EIR (December 2013) was revised to include the following information: The attached single-family homes have a shared wall and occur in a single, larger structure.</td>
</tr>
<tr>
<td><strong>AT-274</strong></td>
<td>The analysis of visual impacts, detailed in EIR Section 4.12, was based on the aesthetics of the community which includes the grade levels of the surrounding homes.</td>
</tr>
<tr>
<td><strong>AT-275</strong></td>
<td>The recirculated EIR (December 2013) was revised to include the following information: The 3,298-square-foot HCJL center, the largest of the proposed structures, would be the same approximate size of one of the larger four bedroom homes south of La Jolla Scenic Drive North and of the four-bedroom attached single-family units east of La Jolla Scenic Way.</td>
</tr>
<tr>
<td><strong>AT-276a</strong></td>
<td>The La Jolla Playhouse is within the RS-1-14 zone and is designated an institutional use because it is owned by UC San Diego.</td>
</tr>
<tr>
<td><strong>AT-276b</strong></td>
<td>The setback of the La Jolla Playhouse structures from La Jolla Village Drive is approximately 100 feet from La Jolla Village Drive. The setback of the project site from La Jolla Village Drive would be approximately 50 feet.</td>
</tr>
<tr>
<td><strong>AT-276c</strong></td>
<td>The structures are approximately 425 feet above mean sea level (AMSL), while La Jolla Village Drive is approximately 375 feet AMSL.</td>
</tr>
<tr>
<td><strong>AT-276d</strong></td>
<td>Vehicular access to the La Jolla Playhouse site is from Scholars Drive South, off Gilman Drive.</td>
</tr>
<tr>
<td><strong>AT-276e</strong></td>
<td>The La Jolla Playhouse is not being used as a justification for the project, rather it was included as part of the bulk and scale survey that compared uses surrounding the project site. While the project sits within the adjacent residential neighborhood, the La Jolla Playhouse is approximately 350 feet north of the project site, and is therefore included as part of the visual survey. As detailed in EIR Section 4.12.1, the project would be consistent with the neighborhood character.</td>
</tr>
</tbody>
</table>

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4.12-23, Paragraph 3: “The neighboring existing homes are generally 15 to 24 feet in height, and the structures would be from 18 to 28 feet in height.”

4.12-23, Paragraph 3: “The three structures would be clustered, and when combined their total gross square footage of 6,499 would exceed the average size of existing single-family homes, but would be comparable to the size of one of the La Jolla Playhouses.”

“Given that the clustered design incorporates open spaces between the structures and a large open central courtyard, the resulting sense of scale is minimized and the built of the project would not be out of scale or monotonous.”

“As shown in the project building elevations in Figures 3-12A-B, the structures viewed from adjacent streets and houses would appear interrelated but separate, with views extending through the site’s open pathways and spaces.”
The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.
The recirculated EIR (December 2013) was revised to include the following information:

As shown in the project building elevations in Figures 3–12A-B, it is the intent of the design that when the structures are viewed from adjacent streets and houses, they would appear interrelated but separate, with views extending through the site’s open pathways and spaces.

The recirculated EIR (December 2013) was revised to include the following information:

The vacant site associated with Phase 2 could be considered to be in a transitional area, where suburban residential development borders attached single-family homes, major roadways, and institutional uses (Figure 4.12-4).

The Recirculated EIR (December 2013) removed the statement relating to “compact, urban nature.” The remainder of the paragraph is accurate and no revision to the Final EIR is required.

“Multi-family” was replaced with “single-family” in the recirculated EIR (December 2013).

The parking lot would be landscaped and a partial height wall would provide a visual screening.

This sentence has been revised in the Final EIR to clarify that the characters of the landscape design.

The recirculated EIR (December 2013) was updated to state that the tree species on-site are not Torrey pines, but are in fact ornamental pines.
### LETTER RESPONSE

<table>
<thead>
<tr>
<th>AT-284</th>
<th>The EIR states that the site is visible from La Jolla Village Drive.</th>
</tr>
</thead>
<tbody>
<tr>
<td>AT-285</td>
<td>This sentence has been revised in the Final EIR to clarify “that the project would not result in a change in elevation of steep hillsides and would not involve mass terracing of natural slopes with cut or fill slopes to construct flat-pad structures.”</td>
</tr>
<tr>
<td>LETTER</td>
<td>RESPONSE</td>
</tr>
<tr>
<td>--------</td>
<td>----------</td>
</tr>
<tr>
<td><strong>AT-286</strong></td>
<td>This sentence is correct as written. The walls would provide some shielding; no revision to the EIR is required.</td>
</tr>
<tr>
<td>With respect to impacts from light and glare of exiting cars, see response to comment AT-106.</td>
<td></td>
</tr>
<tr>
<td><strong>AT-287</strong></td>
<td>The baseline is what the existing condition is at the time. At that time (as current), the Cliffridge property was used primarily for religious purposes; the use is correctly documented within the EIR.</td>
</tr>
<tr>
<td><strong>AT-288</strong></td>
<td>The ownership of the property is not relevant to this CEQA analysis. Additionally, the future use of the property is speculative and does not raise an issue relating to the content or adequacy of the EIR. However, if the property reverted back to single-family use, it would be subject to all municipal code regulations including occupancy and parking.</td>
</tr>
<tr>
<td><strong>AT-289</strong></td>
<td>The project does not have any housing component, nor would it require additional housing.</td>
</tr>
<tr>
<td><strong>AT-290</strong></td>
<td>The comment regarding the registration of Hillel does not raise an issue relating to the content or adequacy of the EIR. No further response is required. However, note that the project would be called the Hillel Center for Jewish Life.</td>
</tr>
<tr>
<td><strong>AT-291</strong></td>
<td>As discussed in Section 9.2.1 of the FEIR, the Existing with Improvements Alternative involves permanent use of the Cliffridge property primarily for religious purposes, which is an allowable use under the Municipal Code. This is not an “office use” as the commenter uses the term. The project is not subject to the Campus Parking Overlay Zone or Maximum Paving and Hardscape regulations. The Final EIR has been revised to remove all discussion related to this issue.</td>
</tr>
<tr>
<td>LETTER</td>
<td>RESPONSE</td>
</tr>
<tr>
<td>--------</td>
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</tr>
<tr>
<td>AT-292a</td>
<td>The comments regarding the current use of the property does not raise any issue related to the substance or adequacy of the EIR. No further response is required.</td>
</tr>
<tr>
<td>AT-292b</td>
<td>With respect to the project setting a precedent, Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.</td>
</tr>
</tbody>
</table>
| AT-293 | 7.3, Paragraph 3: "UCSD Long Range Development Plan (LRDP) includes several on-campus projects which could be constructed and occupied by the time the project would come online in 2015/2016: a. Clinical and Technical Research Institute (CTRI) located on the UCSD East Campus Medical Center in the Health Sciences Neighborhood proposes construction of a 350,000-square-foot building with 2,380 ADT; b. East Campus Bed Tower proposes to expand the existing Thornton Hospital which would generate 8,230 ADT; c. Southwest Cardiovascular Center is constructed and generates approximately 823 ADT; d. East Campus Office Building is currently under construction and would generate approximately 457 ADT.
   - Please refer to questions asked for 4.2-20, Paragraph 4. |
| AT-294 | 7.4, Paragraph 4: "As discussed in Section 4.2, Traffic/Circulation/Funding, the TIA prepared for Phase 1/Phase 2 includes an analysis of the existing, existing plus near-term, and Year 2030 traffic impacts both in terms of direct and cumulative effects.
   - Please refer to 4.3-20, Paragraph 4. |
| AT-295 | 7.4, Paragraph 5: "For the existing with improvements option, there would be no increase in the number of staff or activities and, therefore, no increase in traffic.
   - Was a traffic impact analysis ever prepared for the Cliffridge property's change of use from single-family residential to its current office use? If not, why is it assumed that there will be no increase in traffic with this option?"
   - Modifications to convert the Cliffridge property from temporary to permanent use under the existing with improvements option would not expand or intensify the existing building operations or vehicle traffic.
   - What about conversion from single-family use to "temporary" use? |
| AT-296 | See response to comment AT-187. |
| AT-293 | See response to comment AT-187. |
| AT-294 | As required under CEQA, the baseline to the Traffic Study was the existing condition at the time of the NOP. At that time (as current), |
AT-295 (cont.)
the Cliffridge property was used primarily for religious purposes, and no increase in traffic would occur.

AT-296 See response to comment AT-298.
Noise impacts for this type of project would be attributed to increases in traffic volumes. The noise analysis conducted for this EIR (EIR Appendix G) used cumulative traffic volumes identified for area roads and evaluated the potential effects of noise from increases in traffic on area roadways. An increase of 3 dB is considered to result in a perceptible increase in noise, and in cases where existing noise levels already exceed applicable noise guidelines, a project-related increase of 3 dB may be considered significant. An increase in 3 dB would result from a doubling of the traffic volume on a roadway. Table 7-1 in the Noise Technical Report shows that on a cumulative basis, Phase 1/Phase 2 would not elevate noise levels above 3 dB, which means that there would not be a noticeable increase in noise due to the project.

See response to comment AT-255.

See response to comment AT-280.

With respect to the average square feet stated in Table 4.12-1, it would slightly increase if the project was added to the table. Nonetheless, as discussed above, visual impacts associated with bulk and scale would be less than significant.

This paragraph states that pursuant to CEQA, the No Project Alternative cannot be the Environmentally Superior Alternative. Therefore, another alternative must be so identified.

CEQA requires the inclusion of the No Project Alternative to provide a comparison of project impacts to the proposed project. The No Project Alternative is an alternative that can be selected by decision makers.

EIR Section 3.6 details the history of the project site as related to the proposed project. Specifically, EIR Section 3.6.1 states the following:

Site 653 was also evaluated for potential incorporation into the City’s Park and Recreation Department’s open space inventory in November 2000. As detailed in a City memo from the Director of the Park and Recreation Department (McLatchy 2000), the parcel did not meet the City’s definition as an open space parcel, as it is “completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value.
The project does, however, provide enhanced pathways, extensive landscaping, and a park-like amenity that would all be available to use by the public.

Ownership of land does relate to the feasibility of alternatives to the project.

CEQA Guidelines Section 15126.6(f)(1) states:

Feasibility. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

Ownership of the project site is one of the factors taken into consideration when addressing the feasibility of the alternatives.

The applicant's ownership is not a project objective because the applicant already owns the vacant property. However, an objective of the Phase 1/Phase 2 option is to “contribute to the longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses on a property owned and maintained by Hillel for use by UCSD students.”

With respect to the Cliffridge property, the Existing with Improvements Alternative would not meet several of the project’s objectives.

Leasing space would not allow Hillel to provide a permanent space as it would be at the mercy of the lessor.

The Existing with Improvements Alternative would not increase traffic; however, additional parking would provide spaces for visitors that were parking off-site.
<table>
<thead>
<tr>
<th>LETTER</th>
<th>RESPONSE</th>
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</thead>
</table>
|        | AT-305 (cont.)  
With respect to the baseline of the project’s CEQA analysis, see response to comment AT-290. |
|        | AT-306 The recirculated EIR (December 2013) was updated and this sentence was removed. |
This sentence does not purport to state ownership confers automatic development rights. This sentence states that the No Project Alternative would not maximize the use of land.

A description of the No Project Alternative has been revised to clarify that one of two possible outcomes could result under the no project scenario. If the code violation is resolved through the construction of required improvements, the impacts discussed under the Existing with Improvement Alternative would result. If the code violation is not resolved, the Cliffridge house would revert to single-family use as described in the revised portion of Final EIR Section 9.2.1.

See response to comment AT-311a.

CEQA requires the analysis of alternatives compared to the proposed project. Both the Existing with Improvements Alternative and No Project Alternative are analyzed in comparison to the proposed project within Chapter 9 of the EIR.

See response to comment AT-309.

The recirculated EIR (December 2013) contains additional information regarding the Reduced Project Alternative, which was renamed to the Reduced Project Footprint on Vacant Parcel Alternative.

Specifically, EIR Section 9.2.3 states the following:

This alternative would be 6,099 square feet of GFA (the Cliffridge house is 1,792 square feet; on the vacant site, one building would be 2,494 square feet of GFA without the second floor, and the other would be 1,813 square feet of GFA). Compared to the Phase 1/Phase 2 project (6,479 square feet of GFA), this would represent a reduction of 380 square feet.

By reducing the development footprint from three to two new structures, this alternative would accommodate fewer people, which would reduce the parking demand, thereby requiring less surface parking than the Phase 1/Phase 2. The reduction in parking needed under this alternative would increase the amount of open space.
<table>
<thead>
<tr>
<th>LETTER</th>
<th>RESPONSE</th>
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</thead>
<tbody>
<tr>
<td>AT-310 (cont.)</td>
<td>on-site and would provide an increase in the open space for the landscape plan. Under this alternative, the existing residential structure at the Cliffridge property would be converted to permanent office use for Hillel and brought up to all applicable code requirements for the intended use and occupancy. Modifications to the residence would be to the interior, and the existing architectural design would remain intact. The Reduced Project Alternative would construct two one-story buildings similar in design and utilize similar building materials as the existing single-family residences in the area. As with the Phase 1/Phase 2, the cul-de-sac would be vacated and landscaped with native trees and shrubs to screen the residence/office from the sidewalk and La Jolla Village Drive. In addition, the courtyard/inner yard area would be increased over the Phase 1/Phase 2 project and landscaped with native and drought-tolerant trees, shrubs, and groundcover.</td>
</tr>
<tr>
<td>AT-311</td>
<td>By reducing the development footprint from three to two new structures, this Reduced Project Alternative would fewer people, which would reduce the parking demand, thereby requiring less surface parking than the Phase 1/Phase 2. A parking lot would be required and would be located. See also response to comment AT-313.</td>
</tr>
<tr>
<td>AT-312</td>
<td>As discussed in EIR Section 9.2.3.12, the Reduced Project Alternative provides two one-story buildings of similar architecture style and building materials as the existing on-site residence being used by Hillel and the adjacent houses on Cliffridge Avenue. However, while the Reduced Project Alternative would be of a smaller scale, as designed the Phase 1/Phase 2 option was determined to have no significant visual impacts.</td>
</tr>
</tbody>
</table>
### LETTER

<table>
<thead>
<tr>
<th>AT-313</th>
<th>1. Would this be the only area of potentially reduced impacts? What about scale?</th>
</tr>
</thead>
</table>
| AT-314 | 1. Does the property have to be City-owned? If so, why?  
*The heavily sloping 13,400-square-foot property is located at the intersection of La Jolla Village Drive and Gilman Drive, surrounded by UCSD lands.* |
| AT-315 | 1. On which corner of the intersection is this site located?  
2. Could a map and satellite/street view be provided for the area?  
3. How can such a property be considered a viable alternative under the rule of reason?  
Shouldn't alternative sites be selected only if they are reasonably capable of avoiding or substantially lessening any significant effects of the project (as claimed on Page 9-1)? Paragraph 1?  
9:17, Paragraph 6: *Due to transportation constraints along La Jolla Village Drive, it is anticipated that the Site 675 Alternative would require access to the site from Olders Lane, which is on the UCSD campus. From Olders Lane, construction of a road of several hundred feet through a grove of mature eucalyptus trees would be required.* |
| AT-316 | 1. This suggests the site is on the east side of Gilman Drive. Wouldn't it be more prudent to connect the facility through the existing surface parking lot that lies off of Olders Lane?  
9:19, Paragraph 2: *The La Jolla area has been a rich source of both prehistoric and historic natural resources, and as such, development of the Site 675 Alternative may impact historical resources. Impacts to historical resources would be considered significant.* |
| AT-317 | 1. Given the proximity of the two sites, wouldn't the likelihood of finding prehistoric or historic cultural resources be similar?  
2. Why should the impacts to the Site 675 Alternative be considered any more significant than those for the Phase 1/Phase 2 option?  
9:21, Paragraph 2: *The Existing with Improvements option would not meet many of the project's objectives.* |
| AT-318 | 1. Then why is this option even considered?  
2. Given that this option has been analyzed at a level equal to that of the Phase 1/Phase 2 option, why wasn't a more concerted effort made to analyze other alternatives, such as leasing space, since those solutions, while perhaps not attaining every project objective, could surely meet many? |

### RESPONSE

| AT-313 | This section was revised in the recirculated EIR (December 2013) to state the following:  
The design of the Reduced Project Alternative provides a reduced scale, more similar to the surrounding single-family residential uses. This alternative would consist of two one-story buildings of similar architecture style and building materials as the existing on-site residence being used by Hillel and the adjacent houses on Cliffridge Avenue. However, Phase 1/Phase 2 would have no significant visual impacts. This alternative would have less visual impacts due to the increase in landscaped areas compared to that of the project. |
| AT-314 | There is no requirement that an alternative project site be owned by the City. |
| AT-315 | The recirculated EIR (December 2013) included a map that shows the location of Site 675 Alternative. See Figure 9-1.  
The Phase 1/Phase 2 project does not have any significant impacts that cannot be mitigated. The project's significant but mitigable impacts include paleontological resources, biological resources, and noise. Although the Site 675 Alternative would not avoid or substantially lessen the impacts of the Phase 1/Phase 2 project, this alternative was analyzed in Chapter 9 in order to provide full disclosure to the decision makers and public. |
| AT-316 | This sentence was revised in the recirculated EIR (December 2013) to state the following:  
Due to transportation constraints along La Jolla Village Drive, it is anticipated that the Site 675 Alternative would require access to the site from Scholars Drive South, which is on the UCSD campus. From there, construction of a road of several hundred feet through a grove of mature eucalyptus trees would be required.  
Access from Scholars Drive South would be the most viable to the site. |
The sentence identified by the commenter was updated in the recirculated EIR (December 2013) to state the following:

The La Jolla area has been a rich source of both prehistoric and historic cultural resources, and as such, development of the Site 675 Alternative may impact historical resources. Prior to the approval of development plans, a site-specific cultural resources survey would be required to determine if significant prehistoric, historic, or cultural resources are present, and if so, mitigation would be required. As detailed in Section 4.7, the Phase 1/Phase 2 project would not disturb any historical resources. Thus, the alternative site would not be able to reduce any impacts associated with historical resources. Overall, however, future construction activities associated with the Site 675 would not be allowed to result in the loss of significant cultural resources due to City and State historical resources regulations. Thus, impacts would be considered similar to that of the Phase 1/Phase 2 project.

As detailed in CEQA Guidelines Section 15126.6(b) (emphasis added):

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

Other alternatives were analyzed but ultimately rejected within EIR Chapter 9, including leasing space, for the reasons detailed therein.
As stated in Final EIR Section 9.3, the Existing with Improvements Alternative would be considered the Environmentally Superior Alternative.
AU-1

I am opposed to having the UCSD Hillel Center for Jewish Life in our residential neighborhood. My opposition has nothing to do with the specific religious affiliation of Hillel. I object to the increase in traffic that this Center will bring into our family-centered neighborhood. I most strongly urge you to reject this project.

Thank you.

---

AU-1

Potential traffic impacts for the project are analyzed in EIR Section 4.2. As discussed therein, impacts associated with traffic would be less than significant.
My comments are at the bottom of this page. R.Wiggans

----Original Message----
From: Demorest, Erin <EDemorest@san diego.gov>
To: rogwig@iglo.com
Sent: Mon, Mar 11, 2013 10:19 am
Subject: RE: hillel comment

Hi Roger,

The comments on the Hillel Craf. Eir are due today (Monday, March 11).

They should be submitted to:
E. Shearer, Nguyen,
Environmental Planner
City of San Diego Development Services Center

Please e-mail your comments to sustainability@sandiego.gov with the Project Name and Number in the subject line.

Project Name: UCSD HILLEL CENTER FOR JEWISH LIFE
Project No. 212995

Thanks,

Erin Demorest
Council Representative
Office of Councilmember Sherri S. Lightner
First District, City of San Diego
320 C Street, MS 10A
San Diego, CA 92101
edemorest@san diego.gov
P: (619) 236-8611
F: (619) 236-6999
www.sandiego.gov/cdot
Follow Sherri on Facebook!

Disclosure: This email is public information. Correspondence to and from this email address is recorded and may be viewed by third parties and the public upon request.

From: Lightner, Councilmember Sherri
Sent: Monday, March 11, 2013 10:08 AM
LETTER

To: Crew
From: Roger Wiggins

Subject: FW Hille comment

Sherri,

I have tried to fight my way through the gov. procedure to comment on the proposed construction. No luck. My only comment is:

Foot traffic between the campus and both of the new structures (Ventur building and Hille) is going to create a nightmare for vehicular traffic. Any pedestrians traveling form campus to either of those sites will have to use A) the NS pedestrian crossing light which blocks traffic in 3 directions. Then, those crossing to Ventur will additionally have to B) cross EW to get across Torrey Pines Road, again blocking traffic in 3 directions. Meanwhile, auto traffic that has just passed through from (no turn on red) TP Rd. East onto LJ Village Dr. will again be blocked by pedestrians using the C) NS crosswalk at LJ Scenic. By then tempers will be on edge.

Perhaps an overhead pedestrian bridge would improve the situation, but only partially. I haven't figured out the effect of all the stop and go (mostly stop) traffic but tempers will be at the boiling point. They get that way already.

How can I record this as public comment?

Roger Wiggins
5677 Soledad Mtn Rd
858-525-2627

RESPONSE

AV-1

Potential impacts associated with pedestrian use of the facility are analyzed in EIR Section 4.2. As stated therein, impacts associated with traffic, including hazards, due to pedestrians and bicyclists would be less than significant.
A Cultural Resources Report (2010) was prepared for the Phase 1/Phase 2 project and is included as Appendix F-1 to the EIR, which in turn is summarized in EIR Section 4.7.

Institutional records searches were conducted at the South Coastal Information Center (SCIC) at San Diego State University (SDSU) in 2003, 2007, and again in 2010 (for the current report revision). A review of the combined archaeological records confirmed that 20 cultural resource sites are located within a one-mile radius of the project area, although no cultural resources have been recorded on the subject property. In addition, a Museum of Man records search was conducted on November 12, 2007 that reported 16 cultural resources sites located within a one-mile radius of the project area. No previously recorded sites were reported within the project boundary.

The project site was surveyed in 2003, 2007, and 2010. A total of three isolated artifacts (3 flakes) and less than 10 pieces of shell fragments were identified on the surface. Because of the number of previously recorded sites in the area, an archaeological testing program was completed in 2003. The program consisted of collection of surface artifacts and a series of 20 shovel test pits across the entire project area. No subsurface artifacts were noted. The results of the testing program indicated that an intact cultural deposit is not present on the project site.

Based on the results of the study, no significant archaeological resources have been identified within the project area. The testing program revealed highly disturbed soils with modern trash debris present within a fill deposit. It appears that dirt and gravel were imported onto the lot and a portion of the parcel was leveled by previous grading activities. The EIR determined that no significant resources exist on the project site.
A Sacred Lands File search was conducted by the NAHC on November 15, 2007. The search did not reveal any prerecorded Native American cultural resources in the immediate project area. A representative of the Kumeyaay Nation, Clint Linton of Red Tail Monitoring and Research, Inc., accompanied archaeologists during the 2007 survey. As previously detailed in the response to comment AW-1, based on the results of the testing program, no significant archaeological resources have been identified on the project site.

The CEQA process has included consultation and inclusion of the Native American tribes relevant to the project site.

As previously detailed in response to comment AW-1, based on the results of the testing program, no significant archaeological resources have been identified on the project site. Because of the disturbed soil and lack of cultural resources, no further archaeological testing or archaeological monitoring is required.

See responses to comments AW-1 and AW-5.

As detailed in Section 4.7.4.1(a) of the EIR, in the unlikely event of the discovery of human remains during project grading, all contractor and City staff are required to adhere to California Health and Safety Code Section 7050.5. This section of the Health and Safety Code requires no further disturbance to occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. With implementation of these procedures, impacts to cultural resources would be less than significant.

Sincerely,

Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list
Letter:

Native American Contacts
San Diego County, California
December 10, 2013

Barona Group of the Captain Grande
Clifford LuChippa, Chairperson
1005 Barona Road
Lakeside, CA 92030
sue@barona-nsn.gov
(619) 443-6612
(619) 443-9631

Sycuan Band of the Kumeyaay Nation
Daniel Tucker, Chairperson
5469 Sycuan Road
El Cajon, CA 92019
dasilva@sycuan-nsn.gov
(619) 445-2613
(619) 445-1627 Fax

La Posta Band of Mission Indians
Gwendolyn Paraña, Chairperson
PO Box 1120
Boulevard, CA 92005
gparana@lapostacasino.com
(619) 478-2313
(619) 478-2125

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
PO Box 938
Alpine, CA 91903
jhagen@viejassnsn.gov
(619) 445-3810
(619) 445-5337 Fax

Manzanita Band of Kumeyaay Nation
Leroy J. Elliott, Chairperson
PO Box 1302
Boulevard, CA 92005
ljjbirdserger@aol.com
(619) 786-4930
(619) 786-4957 Fax

Kumeyaay Cultural Historic Committee
Ron Churuman
56 Viejas Grade Road
Alpine, CA 92001
(619) 445-0365

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 366
Valley Center, CA 92082
allen@sanspasqualband.com
(760) 749-3290
(760) 749-3876 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36199 Church Road, Suite 1
Campo, CA 92006
chairgoff@aol.com
(619) 478-9046
(619) 478-5918 Fax

Response:

This box is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7061.5 of the Health and Safety Code, Section 8007.75 of the Public Resources Code and Section 9007.18 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed
SIH12019116930 CECQ Notice of Conditional Draft Environmental Impact Report (DEIR) for the HMR Center for Jewish Lifes located in the La Jolla Community, City and County of San Diego, California.

RTC-627
Native American Contacts
San Diego County, California
December 10, 2013

Jamul Indian Village
Raymond Hunter, Chairperson
P.O. Box 812
Jamul, CA 91935
jamulin@sdccuv.net
(619) 999-4857
(619) 669-9178 - Fax

Kumeyaay Cultural Repatriation Committee
Steve Bangas, Spokesperson
1085 Borema Road
Lakeside, CA 92040
sbenegas50@gmail.com
(619) 742-5587
(619) 445-0881 FAX

Mesa Grande Band of Mission Indians
Mark Romero, Chairperson
P.O. Box 270
Santa Ysabel, CA 92070
mesagrandeband@msgn.com
(760) 782-3818
(705) 782-5992 Fax

Viejas Band of Kumeyaay Indians
ATTN: Julie Hagen, Cultural Resources
P.O. Box 508
Alpine, CA 91903
jhagen@viejias-rn.gov
(619) 445-3810
(619) 445-5337

Kwaaymil Laguna Band of Mission Indians
Carmen Lucial
P.O. Box 775
Pine Valley, CA 91962
(619) 709-4207

Ewilkaapayaq Tribal Office
Will Midlitt, Executive Director
4054 Willow Road
Alpine, CA 91901
wmiddlitt@wilsonrock.net
(619) 445-9315 - voice
(619) 445-9126 - fax

Inaja Band of Mission Indians
Rebecca Cisnera, Chairman
2005 S. Escondido Blvd.
Escondido, CA 92025
(619) 737-7208
(619) 747-9558 Fax

Jipay Nation of Santa Ysabel
Clyt Linton, Director of Cultural Resources
P.O. Box 507
Santa Ysabel, CA 92070
clinton73@aol.com
(760) 803-5694
clinton73@aol.com

This list is current only as of the date of this document.

Contributions of this list does not relieve any person of the statutory responsibility as defined in Section 7605.5 of the Health and Safety Code, Section 8957.36 of the Public Resources Code and Sections 9670 of the Public Resources Code.

Use this list is only applicable for contacting local Native Americans with reports to cultural resources for the proposal.

SCA-2000-101250: CEA Section of Completion, Draft Environmental Impact Report (DEIR) for the Little Center for Jewish Life located in the La Jolla Community, City and County of San Diego, California.
Native American Contacts
San Diego County California
December 10, 2013

Kumeyaay Diegueno Land Conservancy
Mr. Kim Baxted, Executive Director
2 Kwaaipaay Court
Diegueno/Kumeyaay
El Cajon, CA 92019
(619) 445-0238 - FAX
(619) 659-1008 - Office
kimbaxted@gmail.com

Inter-Tribal Cultural Resource Protection Council
Frank Brown, Coordinator, Viejas THPO
240 Brown Road
Diegueno/Kumeyaay
Alpine, CA 91901
frbrown@viejas-thpo.gov
(619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernard Piapa, Vice Spokesperson
1095 Barona Road
Diegueno/Kumeyaay
Lakehills, CA 92040
(619) 476-2113
(KCRC is a Coalition of 12 Kumeyaay Governments)
hp@lappocatrib.com

This letter is current only as of the date of this document.

Distribution of this letter does not relieve any person of the statutory responsibility as defined in Section 7800.5 of the Health and Safety Code, Section 5007.36 of the Public Resources Code and Section 8972.36 of the Public Resources Code.

No letter is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCHD10110120: CSDA Notice of Completion: draft Environmental Impact Report (DEIR) for the HMR Center for Jewish Life, located in the La Jolla Community, City and County of San Diego, California.
LETTER

January 22, 2014

Elizabeth Shearer-Nguyen
City of San Diego
1222 First Avenue, MS-601
San Diego, CA 92101

Subject: UCSD Hillel Center for Jewish Life (aka Hillel Student Center of San Diego)
SC-740; 2010-01030

Dear Elizabeth Shearer-Nguyen:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on January 21, 2014, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21164(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. These comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 J St., Suite 3644
Sacramento, CA 95814
(916) 445-0613 FAX: (916) 322-3310 www.cpc.ca.gov

RESPONSE

AX-1 The comment acknowledges that the EIR complied with the State Clearinghouse review requirements pursuant to CEQA. No further response is required.
# Letter Response

**Document Details Report**

**State Clearinghouse Data Base**

<table>
<thead>
<tr>
<th>SD#</th>
<th>20190101010</th>
<th><strong>Project Title</strong></th>
<th>USDJ Hilltop Center for Jewish Life (aka Hilltop Student Center of San Diego)</th>
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<tbody>
<tr>
<td><strong>Lead Agency</strong></td>
<td>San Diego, City of</td>
<td></td>
<td></td>
</tr>
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<table>
<thead>
<tr>
<th>Type</th>
<th>EIR</th>
<th>Draft EIR</th>
</tr>
</thead>
</table>

**Type**

**Description**

Site Development and Public Right-of-Way vacation to allow the applicant to develop the Hilltop Center for Jewish Life to provide religious programs for Jewish students at the University of CA San Diego, including meetings, one-on-one counseling, and administrative offices.

**Lead Agency Contact**

<table>
<thead>
<tr>
<th>Name</th>
<th>Elizabeth Shearer-Nguyen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agency</td>
<td>City of San Diego</td>
</tr>
<tr>
<td>Phone</td>
<td>(619) 458-5365</td>
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<tr>
<td>Email</td>
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<tr>
<td>Address</td>
<td>1222 First Avenue, MS-501</td>
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<tr>
<td>City</td>
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**Project Location**

<table>
<thead>
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<tbody>
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<td>La Jolla</td>
</tr>
<tr>
<td>Region</td>
<td></td>
</tr>
<tr>
<td>Lat / Long</td>
<td>32.696565° N / 117.342346° W</td>
</tr>
<tr>
<td>Cross Streets</td>
<td>Clifftide Avenue</td>
</tr>
<tr>
<td>Parcel No.</td>
<td>944-131-0100</td>
</tr>
<tr>
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</table>

**Proximity to:**

- Highways
- Airports
- Railways
- Waterways
- Schools

**Land Use**

- Residential/Single Family

**Project Issues**

- Geologic/Geologic; Noise; Traffic/Circulation; Vegetation; Water Quality; Wildlife; Landuse; Anthropogenic-Historic; Biological; Habitat; Other issues

**Reviewing Agencies**

- Resources Agency; California Coastal Commission; Department of Fish and Wildlife; Region 6; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans; District 1; Air Resources Board; Regional Water Quality Control Board; Region 6; Department of Toxic Substances Control; Native American Heritage Commission

**Date Received**

- 12/06/2013

**Start of Review**

- 12/06/2013

**End of Review**

- 01/22/2014

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RTC-631
With respect to potential impacts to historical and cultural resources, the City of San Diego required that a Cultural Resources Report (2010) be prepared for the Phase 1/Phase 2 project. This report was included as Appendix F-1 to the EIR. As discussed in Section 4.7 of the EIR, based on this report, along with adherence to state and local regulatory requirements, it was concluded that the project would result in less than significant impacts to historical and cultural resources. Therefore, no monitoring for cultural resources would be required.

A Sacred Lands File search was conducted by the Native American Heritage Commission and did not reveal any prerecorded Native American cultural resources in the immediate project area. An archaeological resources survey was conducted with a representative of the Kumeyaay Nation, Clint Linton of Red Tail Monitoring and Research, Inc. accompanying. No significant archaeological resources were identified on the project site.

The City acknowledges the updated contact information.
A Cultural Resources Report (2010) was prepared for the Phase 1/Phase 2 project and is included as Appendix F-1 to the EIR, which in turn is summarized in EIR Section 4.7.

The project site was surveyed in 2003, 2007, and 2010. A total of three isolated artifacts (3 flakes) and less than 10 pieces of shell fragments were identified on the surface. Because of the number of previously recorded sites in the area, an archaeological testing program was completed in 2003. The program consisted of collection of surface artifacts and a series of 20 shovel test pits across the entire project area. No subsurface artifacts were noted. The results of the testing program indicated that an intact cultural deposit is not present within the project area.

Based on the results of the study, no significant archaeological resources have been identified on the project site. The testing program revealed highly disturbed soils with modern trash debris present within a fill deposit. It appears that dirt and gravel were imported onto the lot and a portion of the parcel was leveled by previous grading activities. Because of the disturbed soil and lack of cultural resources, no further archaeological testing or archaeological monitoring is required.
La Jolla Community Planning Association

10 February 2014

Ms. Elizabeth Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Department
1222 First Avenue, MS 501
San Diego, CA 92101

RE: Hillel Center for Jewish Life, Project No. 212995
Comments on Recirculated draft EIR

Dear Ms. Shearer-Nguyen:

Please accept this letter as the official comments of the La Jolla Community Planning Association, the duly recognized planning group for the community of La Jolla.

At its regular meeting of February 6, 2014 the LJCPA discussed the Recirculated draft EIR and heard testimony from the applicant and from the public.

On a 12-1-1 vote, the LJCPA passed a motion to send the attached comments for the City’s review and response. These comments supplement the comments made by the LJCPA in March 2013 regarding the draft EIR.

Sincerely,
La Jolla Community Planning Association

Joe LaCava
Vice President and Chair of the February 6, 2014 meeting

cc: Trustees of the La Jolla Community Planning Association
The La Jolla Community Planning Committee at its regular meeting on February 6, 2014 voted 12-1-1 to supplement its comments dated March 2013 (Attachment “B”) with the following additional comments.

BA-1: This comment is an introduction to comments that follow. No further response is required.

The LJCPA finds the Recirculated dEIR deficient in the following areas:

1. Use of an attendance limit of 50 persons for noise analysis, even though the building has occupancy limit far greater.

2. Increased traffic in the area due to projected future building in the Scripps Upper Mesa site next to the Venter Institute.


4. The traffic pattern, turning from LJ Village drive onto LJ Scenic Drive North makes the driveway unsafe.

5. Onsite parking inadequate for a religious designation and for a student center that can hold 100 to 150 people.

6. The project will be precedent setting.

7. Loss of 9 spaces of street parking in the campus parking overlay zone in an area already impacted by the UCSD campus.

8. Tall windows on the buildings will create light pollution into the residential neighborhood.

9. Cumulative effect of other student centers being built in the single family zone.

10. Failure to analyze additional alternative uses.

11. Failure to analyze the issue of student center versus religious institution.

The comments above are more fully discussed and expanded in Attachment “A.”
LETTER

La Jolla Community Planning Association
Comments on Recirculated EIR - Hillel Center for Jewish Life
Page 2 of 5

ATTACHMENT “A”

BA-2

Noise Analysis is Inadequate

The anticipated noise levels presented in the Draft EIR are based on attendance projections of only 50 students. As currently proposed the project has an inside occupancy capacity of over 200 persons for events, four times what is used in the noise analyses contained in the Draft EIR. There are very specific Municipal Code noise level limitations applicable to single-family residential zones. The DEIR fails to consider the maximum occupancy for noise generation and fails to analyze noise levels emanating from the Hillel Student Center. In addition, the Draft EIR fails to address the noise generated by delivery trucks and trash pick-up trucks servicing Hillel’s commercial kitchen while stopped in front of the single-family homes on La Jolla Scenic Drive. The DEIR completely omits noise levels generated from outside events and the noise oncomings and goings of event attendees.

BA-3

Increased Traffic Due to Projected Future Development Not Addressed

The DEIR fails to consider the impact of Hillel’s traffic in combination with additional future traffic that will be generated by future development similar to the Venier Institute. At a minimum there will be three future developments in the immediate area the size of the Venier Institute with employee, visitor, and client traffic attendant to each. The DEIR should be revised address future traffic increases and input on this area as required by the California Environmental Quality Act.

BA-4

The Traffic Safety Analysis is Deficient

The current Hillel Student Center design calls for a driveway entrance on La Jolla Scenic Way. The Draft EIR says that the Caltrans Highway Design Manual requires 200 feet of stopping distance prior to entering a driveway on roadways with a 30 mph speed limit. The Draft EIR states the project driveway only has sight distance at 150 feet from the driveway to the intersection; a 25 percent reduction from the Caltrans recommended stopping distance. Additionally, southbound vehicle traffic on La Jolla Scenic Way will be required to merge from 2 lanes to 1 lane, in the same area with Hillel’s planned driveway opening. The Draft EIR should be amended to adequately analyze these traffic safety concerns of not complying with Caltrans design standards in this heavily trafficked block of La Jolla Scenic Way.

Commercial deliveries to Hillel’s commercial kitchen and trash pick-up will occur on the south side of the site on La Jolla Scenic Drive in front of the single-family homes. After stopping on La Jolla Scenic Drive, commercial delivery trucks and commercial trash trucks will then have to proceed south on Cliffridge Avenue through single family residential neighborhood. The Draft EIR should be amended to adequately analyze the traffic safety and environmental quality concerns of heavy commercial trucks passing the single family residential neighborhood.

RESPONSE

BA-2

With respect to occupant limits, as stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

With respect to noise, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m., and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. While additional visitors could be located within structures, the on-site noise sources anticipated from the project site would include activities at the courtyard and patios. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices within these exterior areas, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.
the project (EIR Appendix G) based the evaluation of this alternative on a maximum of 50 speaking voices. EIR Section 9.2.1 concludes that noise related to on-site uses for the Existing with Improvements Alternative would be consistent with existing measured noise levels, and therefore would not be significant when compared to existing and future traffic noise levels.

Sections 4.8.3.1 and 4.8.3.2 have been revised to include a brief discussion of potential noise impacts associated with anticipated special events at the Hillel facility that could attract more than the general daily average amount of visitors. It was determined that impacts would be less than significant.

A waste collection truck would come once a week, the same day/time as the surrounding neighborhood. This would not result in noise generation above City regulations.

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.
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<th>LETTER</th>
<th>RESPONSE</th>
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<tr>
<td>BA-4</td>
<td>The driveway meets City of San Diego standards for sight distance. The traffic study shows that the project adds less than 6 peak hour trips to the section of La Jolla Scenic Way mentioned in the comment. A car less than every 10 minutes will not negatively impact La Jolla Scenic Way. The existing traffic merge is not a safety concern with the very small amount of additional traffic. A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.</td>
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Hillel was incorporated in the State of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “. . . is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used...
in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.
Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
LETTER

BA-8 Campus Parking Overlay Zone

The Hillel site is located within a City designated Campus Parking Overlay Zone which requires that the facility accommodate on-site all of the automobiles of those visiting the facility. On street parking of visitor’s automobiles is not allowed in the overlay zone. As mentioned previously, visitor parking will very likely overflow onto the adjacent streets and significantly reduce the amount of on-street parking available for students and residents alike.

The SDMC requires the preservation of existing on-street parking within the Campus Parking Overlay Zone. However, project will close the cul-de-sac at Torrey Pines Road North eliminating the existing street which currently provides on-street parking spaces. The DRAFT EIR fails to analyze the environmental impact of the loss of those 9 spaces and the impact of those 9 automobiles having to park further south into the residential neighborhood.

BA-9 Light Pollution into Residential Neighborhood

The DRAFT EIR fails to analyze the visual impact on residential neighborhood character of significant amounts of artificial light emanating during hours of darkness from the extensive windows of the assembly spaces along the southern exterior walls of the facility being cast into the residential neighborhood.

BA-10 Cumulative Effect of Student Centers in Residential Neighborhoods

UCSD students are served by approximately 500 student organizations, of which 54 are considered “spiritual” organizations. Hillel is just one such organization. The proposed Hillel facility can accommodate over 200 students for assembly purposes.

The DRAFT EIR fails to analyze the cumulative effect on residential neighborhood character by additional future student center/religious facilities constructed within the residential neighborhoods.

RESPONSE

BA-8 The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

BA-9 As described in EIR Chapter 3, the facility’s regular hours of operation would be between Monday through Friday, 9:00 a.m. to 10:00 p.m., but generally the facility would only be open during the evenings and on weekends if there is an activity planned at such times. The lighting during these activities would not be excessive.

EIR Figure 3-12b shows a rendering of the proposed project, including the south elevation. The buildings would not be oriented toward the residences located towards the south. The buildings have been designed to face La Jolla Village Drive and La Jolla Scenic Drive North. Thus, no impact from interior lighting spilling over to residences would occur.

BA-10 Facility occupancy would be limited as discussed in response to comment BA-2. See also responses to comments BA-5 and BA-6.

The comment regarding impacts associated with future facilities is speculative as all future projects in the neighborhood would be analyzed on a case-by-case basis. As such, this comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
La Jolla Community Planning Association (LJCPA)

Motion:
regarding the Hillel Draft Environmental Impact Report (DEIR):

That the Hillel Draft Environmental Impact Report (DEIR) is deficient and contains major errors and omissions regarding: 1) the proposed Hillel project's immediate and cumulative impacts on the surrounding neighborhood; and 2) the project's substantial, precedent-setting non-compliance with the La Jolla Shores PDO, the Municipal Code, and the La Jolla Community Plan. The LJCPA adopts the findings and conclusions of the Ad Hoc Comm. Minutes and three attached letters. These deficiencies are documented in the attachments to this motion and include, but are not limited to the DEIR:

A. Ignoring that a student center is not an allowed use in a residential neighborhood.
B. Ignoring the La Jolla and City-wide precedent that would be set by allowing a student center in a residential neighborhood—e.g., UCSD's website currently recognizes 60 spiritual student organizations on campus.
C. Failing to consider possible alternative sites close to UCSD where the zoning would permit a student center.
D. Failing to consider the impact of the soon-to-be-open Venter Institute in assessing the project's traffic impact—in fact, the new Venter Institute is not even mentioned in the DEIR.
E. Failing to point out the lack of required on-site parking spaces for Hillel's stated use for the project (i.e., a place of religious assembly) as well as failing to substantively address the associated loss of on-street parking in a Parking Impact Overlay Zone.
F. Failing to provide findings to support the requested vacation of a public right-of-way.
G. Failure to adequately consider the visual/community character impacts of the proposed student center project on the surrounding residential homes and neighborhood, including: a) setbacks, b) bulk and scale, c) intensity of use, d) noise.

Attachments:
- Minutes of the LJCPA Ad Hoc Committee, which reviewed the Hillel DEIR.
- Bill Merten letter to the Ad Hoc Committee, dated 2/27/13, regarding the Hillel DEIR
- Ross L. Staur, Ph.D. letter to City of San Diego Development Services Department, dated 1/30/13, regarding the Hillel Center for Jewish Life (submitted to the Ad Hoc Committee).
- Julie Hamilton letter to the Ad Hoc Committee, dated 2/27/13, regarding the Hillel DEIR.
La Jolla Community Planning Association
Ad Hoc Committee to Review the Hillel Project’s draft EIR

La Jolla Recreation Center
615 Prospect Street

Ad Hoc Comm. Members: LCAPA Trustees Brady, Costello (Chair), Courtney, Fitzgerald
Public Attendees: 18 members of the public signed in, and 5 opted not to sign in.

Committee Objective: to discuss the Draft EIR of the “UCSD Hillel Center For Jewish Life” and prepare a response to the DEIR for the La Jolla Community Planning Association. The La Jolla Community Planning Association will vote on the response on 7 March 2013.

Minutes (not approved) and Report from the 27 Feb 2013 Meeting.
(Note: Items were rearranged for organization and clarity.)

Items of Discussion, Errors, or Omissions of the DEIR:

1. Project Alternatives

Contrary to the DEIR statements a very reasonable range of alternative sites exist.

A. Alternate Sites are available in the area.
   1) undeveloped land is available North of Genesee Ave near the Lawrence Family Jewish Community Center
   2) developed commercial space is available North, East and South of the UCSD Campus

B. An example of a currently existing student religious center situated in a properly zoned area.
   The Newman Center Catholic Community at UCSD
   4321 Eastgate Mall (off Genesee Ave)

II. Cumulative Impacts.

2. Construction of nearby institutions.
   The Venter Institute, being constructed across Torrey Pines Rd., is not mentioned. The impact of the Venter Institute was not considered, including the increase in traffic volume, driving/traffic hazards, and parking. Venter has applied for a permit for a curb cut which will open on Torrey Pines Rd. This curb cut will be about 150 ft from La Jolla Village Dr. By law, the DEIR must consider impacts that will change traffic near the project. These must be considered for both Cumulative Impacts and Traffic.

3. Traffic.
   A single family house generates 19 ADT, Hillel currently yields 200 ADT (based on data of current use, not proposed larger facility). That is 26 times the amount of traffic from a house. The projected ADT seems unrealistically low, and does not
account for increased use of the facility is successful. The large difference in traffic is another reason why the Municipal Code prohibits this use.

DEIR didn’t discuss the safety of reducing the street width of LJ Scenic Drive North by 2 feet (or 34 ft). Corners will be non-standard and the connecting radius will be non-standard. Drivers will not expect this, how will safety be affected?

The Venten Center (3,659 sq ft, 146 parking spaces) and other planned projects across Torrey Pines Rd are not considered. Venten alone should add significant traffic, but not counted in the DEIR. Venten traffic will be required to turn right, go South on Torrey Pines Rd. Anyone going North, East or West will: 1) go to the traffic lights at Glenbrook and Dubway to do a U-turn on Torrey Pines Rd., or 2) drive through the neighborhood on Cliffridge and La Jolla Scenic Drive to avoid one set of lights at Torrey Pines Rd and La Jolla Village Drive. This impact is not discussed.

Traffic is Summary. The DEIR is required to consider major future and cumulative impacts.

A. Precedent Setting for student centers in Single Family Zones
   The mechanism could be to purchase a single family house, then change use to a student center. Let’s see could make larger student centers. The DEIR pg 6.2, states that UCSD has 54 spiritual organizations. As of this date there are 60 spiritual organizations listed from a total of 530 student organizations at UCSD.

B. Student Centers are prohibited in Single Family Zones by the Municipal Code.

C. The Precedent Setting, then Cumulative Impact will be that the 53 spiritual organizations could all be allowed to build a student center in the residential zone changing the zones character. The Hillel facility would be the precedent here and in other single family zones in the City.

D. There will be a Precedent Setting Growth Inducement Impact.

Notes: DEIR refers to reduction of noise from the buildings interior. There is no mention of noise generated outside the buildings, outside ceremonies, people entering and existing buildings at night, opening-closing doors, talking, traffic. The DEIR did not evaluate the maximum use of the facility complex, or at the maximum capacity, or the use of doors used. There was an acknowledgement that noise will exceed that from the Cliffridge house.

Noise Ordinance allows Single Family Residential: 50 dBA 7 AM to 7 PM
45 dBA 7 PM to 10 PM
40 dBA 10 PM to 7 AM
65 CNEL

Places of worship are allowed exterior noise of:
70 CNEL (that is, weighted over 24 hr, instead of one hr weighting for Residential) DEIR pg 4.8-1, 4.8-2. Expected allowable noise levels associated with the Hillel Project is incompatible with Single Family Housing.
III. Visual Effects and Neighborhood Character

Applicable Design Regulations

Excerpts from Mr. Morton’s Letter below.

Section 4.12.1.3 Land Development Code/La Jolla Shores Planned District
Ordinance, includes excerpt from the La Jolla Shores PDO which states:

General Design Principles and Requirements

No structure shall be approved which is substantially like any other structure located on
an adjacent parcel. Conversely, no structure will be approved that is so different in
quality, form, materials, color, and relationship as to disrupt the architectural unity of
the area.

Single-Family Zone Development Regulations

The specific LJPDO Development Regulations for the Single Family Zone that
are relevant to the visual aspects of the project include the following:

Building and structure setbacks shall be in general conformity with those in the vicinity.

The report correctly identifies building and structure setbacks being in general
conformity with those in the vicinity; as being a relevant design consideration, but never
attempts to explain how the proposed project complies with this regulation. This glaring
omission may be due to the fact that the proposed building and structure setback, along La
Jolla Scenic Drive North are not in general conformity with those in the vicinity (across
the street) and therefore so different in relationship to the street that the project will
disrupt the architectural unity of the area.

(Ad Hoc Comm. summary. The houses are generically setback about 40 ft from the
street with their garages closer to the street giving a back and forth pattern. The very
much more massive Hillel will be too close to the street and out of neighborhood context.)

Therefore, the proposed project is not in accordance with the General Design
Principal section or the Building and structure setback regulations of the LJPDO.

The LJPDO states: General Design Regulations

To conserve important design character in La Jolla Shores, some uniformity of
detail, scale, proportion, texture, materials, color and building form is necessary.

Create harmonious form relationships among houses. Groups of houses should
appear related to one another rather than jumbled together without pattern.

Strive for consistency within groups through use of recurring shapes and
materials. All the houses in one area should be designed to tie together and relate to
one another. This is just another glaring omission from the draft report relating to
neighborhood character. See Mr. Morton’s Letter for complete content.

More Visual Effects and Neighborhood Character

Visual Effects. The 2 level houses referred to by the DEIR are way off to the East,
and are at a significantly lower elevation than the Hillel buildings, causing them to be far
less prominent. The Hillel buildings will be the most prominent around with the second
story structures dominating from La Jolla Village Drive.

La Jolla Community Planning Association Page 4 of 23 Ad Hoc Committee Minutes
10. Level of Activity. There will be many more people using Hillel than a single family house, and the activity will be at all hours of the day and evening. The activities from several locations will be consolidated here. If the facility is successful, then activity level will be greater than the current sum.

11. Traffic, ADT. Hillel currently yields 200 ADT, a single family house yields 10 ADT.

12. People, more people with more noise than Single Family zones. Hillel states an artificial limit on the number of students using the center. If it is successful, the number of students will certainly be greater than stated.

13. No Enforcement. There is no mechanism to maintain or enforce the level of activity or number of people at events.

14. from Dr. Starr’s Letter Omission 4, Site’s required use and dedication of La Jolla Scenic Way: Open space on the site is required as mitigation of development on Gilman Dr. Driveway access to the project on La Jolla Scenic Way violates the dedication of La Jolla Scenic Way. See Dr. Starr’s Letter for complete content.

IV. Project Objectives.

15. A. Goal of walking distance. UCSD is ~ 2.5 miles E to W, and ~ 1.5 miles N to S with classrooms and dorms spread throughout. Locating a student center at any point on the UCSD periphery cannot satisfy the walking distance goal because of the homogenous spread of dorms and classrooms. There is simply no single point to be near.

16. B. There is to be a consolidation of uses from different areas to this site, yielding an increase in intensity of use at the single location.

17. C. There is no enforcement of Hillel’s stated limits of use.

18. D. Purpose of the Facility:

<table>
<thead>
<tr>
<th>House of Worship or Student Center?</th>
<th>DEIR pg 3-15 Table 3-1,</th>
<th>3,682 sq ft</th>
<th>57%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student Center</td>
<td></td>
<td>3,682 sq ft</td>
<td>57%</td>
</tr>
<tr>
<td>Library-Chapel</td>
<td></td>
<td>984 sq ft</td>
<td>15%</td>
</tr>
<tr>
<td>Leadership Building</td>
<td></td>
<td>1,313 sq ft</td>
<td>20%</td>
</tr>
<tr>
<td>Gross Building Area</td>
<td></td>
<td>6,479 sq ft</td>
<td>100%</td>
</tr>
</tbody>
</table>

Of the floor area, only 15% is for Library-Chapel, yet 57% is for a Student Center. Obviously, teaching Leadership is also a Student Activity (then 85%). The obvious conclusion is that the Project is a Student Center, which is not an allowed use in a Single Family Zone.

19. Paraphrased Summary from Dr. Starr’s Letter. Inaccuracy 2. Attendance: (The inclusion of a large kitchen and square footage lend themselves to greater uses than stated.) See Dr. Starr’s Letter for complete content.

20. V. Parking. An unacceptable land use impact would arise if the City declared this a religious institution but failed to apply the parking standards for a religious institution.
**LETTER**

<table>
<thead>
<tr>
<th>LDC requires Religious Inst.</th>
<th>Plan in the DEIR show</th>
<th>Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 parking space / 3 fixed seats or 30 spaces / 1,000 sq ft assembly area</td>
<td>there are no fixed seats</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>reasonable assembly area (1,600 sq ft or 3,000 sq ft)</td>
<td></td>
</tr>
</tbody>
</table>

Hillel is providing 27 parking spaces. This is substantially less than the 48-90 spaces that would be required by Code for a church, temple, or place of religious assembly, assuming 25% (1,600 sq ft) or 40% (3,000 sq ft) of the total space available in the facility was available for this purpose. 27 parking spaces would be adequate only if less than 14% of the facility were designated for religious assembly. As a result, within the DEIR, the proposed Hillel project appears to have at least two distinct definitions—a religious institution for “allowed use” purposes and a “student center” (or something else) for required parking purposes.

**21.** In addition to not meeting the parking standards, the proposed project will be removing 8 on-street parking spaces, and the cul-de-sac vacation with red curb will lose another 20 or so spaces.

**VI. ROW Vacation:** Vacation of the cul-de-sac at L. Scenic Drive North.

**22. Omission 1, Right of Way Vacation:** (The four Municipal Code findings for a ROW vacation can’t be met.)

**23. Omission 2, Traffic Safety, ROW Vacation:** (Dangerous turn, unsafe visibility, dangerous blind corners) See Dr. Starr’s letter for complete content.

**24. Parking Impact:** The Google photo in the DEIR shows UCSD students using the street for parking. Up to 22 on-street parking spaces will be lost if the cul-de-sac is vacated and the curb painted red for the standard sight distance, DEIR pg 3-45.

**25. Other Uses will be Impacted:** The cul-de-sac is used 365 days a year. People use it as a turn-around, parking. The City uses it to park heavy equipment when needed.

**26. VII. Cliffridge Property:** The use of the Cliffridge property for an office building in a Single Family Zone is illegal (Muni. Code131.0401). Continued use of an office and Phase I should be permitted. Phase I would require a deviation for the additional 6 parking spaces and reduction in landscape increase in landscape. They should also apply for a Residential High Occupancy Permit. This would be a significant impact on the surrounding community and should not be (is not) allowed.

Please read the attached written comments received from:

- Mr. Phil Merten
- Dr. Rose Starr
- Ms. Julie Hamilton
Finally, the above items will be arranged into a Motion for a response to be presented to the LCPC for a vote on 7 March 2013.
Phil Merten  27 Feb 2013

please consider the following comments:

Section 4.12 of the EIR deals with "Visual Effects and Neighborhood Character".

Section 4.12.1.3 deals with "Applicable Design Regulations".

Section 4.12.1.3 (b) Land Development Code/La Jolla Shores Planned District Ordinance, includes excerpt from the La Jolla Shores PDO which states:

General Design Principles and Requirements

Design Principle:

Originality and diversity in architecture are encouraged. The theme "unity with variety" shall be a guiding principle. Unity without variety means simple monotonous; variety by itself is chaos.

No structure shall be approved which is substantially like any other structure located on an adjacent parcel. Contrarily, no structure will be approved that is so different in quality, form, materials, color, and relationship as to disturb the architectural unity of the area.

This section of the report also correctly states:

Single-Family Zone Development Regulations

The specific LOSPD Development Regulations for the Single-Family Zone that are relevant to the visual aspects of the project include the following:

• Building and structure setbacks shall be in general conformity with those in the vicinity.

27. The report correctly identifies "building and structure setbacks being in general conformity with those in the vicinity" as being a relevant design regulation, but never attempts to explain how the proposed project complies with this regulation. This glaring omission may be due to the fact that the proposed build and structure setbacks along La Jolla Scenic Drive North are not in general conformity with those in the vicinity (across the street) and therefore are no different in relationship to the street that the project will disrupt the architectural unity of the area.

28. The front exterior walls of the existing dwellings along the south side of La Jolla Scenic Drive North have front yard setbacks on the order of 40 feet. These structures have attached garages of 22 to 24 feet in width that are setback 20' to 15' from the front property line. The cumulative effect of the existing dwellings are front yard structure setbacks that alternate between 12' and 36' and 15' and 90' and 12' and 60' and 15' and 36' etc. along the entire length of La Jolla Scenic Drive North. In contrast, the subject
southwestern building proposes a building facade 80' long setback 10' to 11' from the street property line, and the subject western building proposes a building facade 70' long setback 10' to 11' from the street property line. Taken together these two structures present a exterior facade of more than 170' in length setback just 10' to 12'. The subject development and its proposed setback from La Jolla Scenic Drive North is definitely not in general conformity with those in the vicinity; and the form and relationship of the proposed structures to the street is so different in relationship from that of existing structures in the vicinity that the proposed project will disrupt the architectural unity of the area. Therefore, the proposed project is not in accordance with the General Design Principal section or the Building and structure setback regulations of the LJSIDO.

Finally, the LJSIDO states:

General Design Regulations

Concurrent with the adoption of the La Jolla Shores Planned District Ordinance, the City Council adopted architectural and design standards, by resolution, to be used in evaluating the appropriateness of any development for which a permit is applied under the La Jolla Shores Planned District Ordinance, such architectural and design standards shall be filed in the office of the City Clerk as a numbered document.

29. The numbered document is the La Jolla Shores Design Manual. Unfortunately, the EIR makes no mention of the La Jolla Shores Design Manual or three of its provisions that state:

30. To conserve important design character in La Jolla Shores, some uniformity of detail, scale, proportion, texture, materials, color and building form is necessary.

and

31. Create harmonious form relationships among houses. Groups of houses should appear related to one another rather than jumbled together without pattern.

32. Strive for consistency within groups through use of recurring shapes and materials. All the houses in one eye span should be designed to tie together and relate to one another.

This is just another glaring omission from the draft report relating to neighborhood character.
Ms. E. Shearer-Nguyen  
Environmental Planner  
City of San Diego Development Services Center  
1222 First Avenue, MS503  
San Diego, CA 92101  
DSDPAS@SANDIEGO.GOV

Subject: UCSD Hillel Center for Jewish Life, Project No. 212935

Dear Ms. Shearer-Nguyen,

Thank you for providing the Recirculated Draft EIR for the subject project, previously known as Hillel of San Diego Student Center II. I am grateful that you have managed this process gracefully and with professionalism. The following comments are provided with respect.

I note the following inaccuracies and omissions:

3.4 Inaccuracy 1: Religious Characterization: The UCSD Hillel Center for Jewish Life, formerly known as Hillel of San Diego Student Center II, is characterized in the recirculated DEIR as a “church, temple, or building of a permanent nature, used primarily for religious purposes.” The development, on the contrary, is a student social center as the original name implies. This is made abundantly clear by public remarks of the promoter of the project Mark Steele, on October 27, 2010: “The facility really is primarily simply a student center, study center, some office space, and that is not longer to be used for any major gatherings whatsoever.” Thus, within the meaning of the La Jolla Shores Planned District Ordinance, it is not a permitted use — university facilities are not allowed in the LSDPO.

That the project is a student activity center — as its original name implies — is verified by the Hillel of San Diego mission statement (Appendix 1). The mission statement clearly defines Hillel as a student social organization with an ethnic/religious affiliation, not a church, temple, or synagogue.

The use of the project for large social gatherings is verified by the details of the structure: a 400 sq. ft. kitchen with 8-burner stove top, ground floor men’s lavatory, with two toilets, one urinal, three sinks, and a shower; ground floor women’s lavatory, with three toilets, three sinks, and a shower. The 3,682 square foot HCL Student Center and the 1,913 square foot HCL Professional Leadership Building dwarf the 944 square foot library/chapel. This is not a structure primarily for religious purposes — a building (primarily symbolic) 15% of the building (library/chapel) may be for religious purposes.
34. **Inaccuracy 2, Attendance:** The DEIR asserts that except on "rare" occasions, maximum public attendance at the project will be 50 persons, and that large events, e.g., Shabbat meals, will not be held at the project. Of course this estimate is not binding on future use of the facility. The assertion is simply inconsistent with the design of the project. It is a 6,479 square foot structure that includes a 900 sq. ft. kitchen with 8-burner stove-top; ground floor men's laundromat with two washers, one spin, three sinks, and a shower, ground floor women's laundromat with three toilets, three sinks and 3 shower. The structure includes ample space and accommodations for gatherings of hundreds of persons, Shabbat meals, guest speakers, holiday celebrations. The showers (to accommodate bicycle traffic) can also facilitate overnight accommodations (e.g. at Sukkot). Expansion of open assembly space in the structure can be arranged without additional permits by interior remodeling. The 2006 version of the proposal was explicit in including weekly Shabbat meals and holiday celebrations; the current proposed structure is suited to accommodate them.

The relevant attendance figure is not the applicant's estimate of future use, but the occupancy load of the building. A building with approximately 3000 square feet of open assembly space, 964 square feet of library, and approximately 1000 square feet of offices would ordinarily imply an occupant load of approximately 250 persons (see http://www.scribd.com/doc/132899268/Section-1004-Occupant-Load). That is the peak use figure that is relevant.

35. **Inaccuracy 3, Required Parking:** The DEIR includes a remarkable misstatement, "There are no specific parking regulations for the proposed use of Phase 2 of the HCL in the City's Municipal Code." On the contrary, of course, the LJSPO and the Municipal Code are quite clear in Municipal Code section 1510.1010 (a) and 142.0850(c) Table 142-095: If one accepts the recirculated DEIR's premise that the proposed use is a "social, cultural, or religious purpose," then the municipal code requires "churches and places of religious assembly" to provide 1 [parking space] per 3 seats; or 1 per 60 inches of pew space; or 36 per 1,000 square feet assembly area if seating is not fixed." The 27 proposed parking spaces are suitable for 3000 square feet of assembly area. The actual structure of 6,479 square feet might then be construed to require 155 parking spaces. Of course interior open space suitable for group assembly in the structure is smaller, approximately 3900 square feet. A minimum of ninety (90) parking spaces is required by the LJSPO and the Municipal Code: the proposal is at least 63 parking spaces deficient.

Perhaps the recirculated DEIR is premised on semantic misconstruction, that the HCL is "building ... of a permanent nature, used primarily for religious purposes" but not a "place of religious assembly." The intent of the Municipal Code is clear—those terms are intended as synonymous.

36. **Inaccuracy 4, Precedent:** Section 6.3 of the DEIR notes "development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively." Locating UCSD facilities, purported to be religious, in the single-family residential area is a precedent. There are dozens of religiously affiliated organizations at UCSD, ranging from the Acts 2 Fellowship, to the Zecostrom Youth Connection of San Diego, (see http://www.ucsd.edu/departmentalregistration/RDoc/114115t.pdf), to the UCSD Jewish Community Planning Association. The
LETTER

Recirculated DEIR correctly notes that such follow-on development requires financial support and a choice of location. Phase 1 creates an ample precedent.

Quoting from the recirculated DEIR:

While there is a potential for other UCSD student religious organizations to seek off-campus facilities in the project area, the constraints of finding a suitable site would be a limiting factor. The area in which the project is proposed is mostly developed with UCSD and Scripps in close proximity to the project site as well as existing residential uses. Although there are small parcels of undeveloped land nearby, future development in this area is largely constrained by existing development, allowed uses, permitting and environmental review requirements, and the cost of acquiring land. Therefore, development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Translating these remarks: the precedent is indeed set. Approval of the HCL project (formerly known as Hill) of San Diego Student Center II) means that any UCSD student religiously-affiliated organizations with enough money to buy several adjacent (already developed) lots will be freed by the HCL precedent to install its own student center in the single-family neighborhood. The single-family area can become a neighborhood of religiously affiliated student organizations and their administrative offices.

37. Conclusion 1, Right of Way Vacation: The DEIR notes that a right of way vacation on the 8960 block of La Jolla Scenic Dr. will be required to undertake the project, but it does not investigate whether the required right of way vacation is lawful. The municipal code requirements for a right of way vacation are:
   (a) There is no present or prospective public use for the public right-of-way;
   (b) The public will benefit from the action through improved use of the land made available by the vacation;
   (c) The vacation does not adversely affect any applicable land use plan;
   (d) The public facility for which the public right-of-way was originally acquired will not be detrimentally affected by the vacation.

All four of the findings must be fulfilled.

A full review of the project will demonstrate that none of the findings can validly be made. This reflects in part the distinctive topography of the 8960 block of La Jolla Scenic Dr.

The roadway in that area has a peculiar L-shape configuration including turn of 120° at the east end and a west and east (La Jolla Scenic Way) stop (Griffith Ave.). See Appendix 2. This configuration is inherently unsafe due to restricted visibility, a peril that will be exacerbated by the student center traffic. Planned use of the vacated right of way by the proposed project includes narrowing the hardscape pavement on the 8960 block. Narrowing the roadway makes it semi with dangerous blind corners more dangerous still. Hence finding (a) cannot be made.

The vacation facilitates landscape of the property, a public benefit. But there is a serious public cost: loss of on-street parking in a heavily trafficked area. Finding (b) cannot be made.

La Jolla Community Planning Association
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RESPONSE
--- indeed including planning documents signed by Mr. Mark Steele --- designating the area as open space and not suitable for development. Finding (c) cannot validly be made.

The right of way provides the landscape street pavement of the 8900 block of La Jolla Scenic Way. The proposed vacation would allow narrowing the pavement, adversely affecting traffic flow and traffic safety on the 8900 block. Finding (d) cannot validly be made.

38. Omission 2, Traffic Safety. The recirculated DEIR and the associated traffic study do not address traffic safety on the 8900 block of La Jolla Scenic Dr. The roadway in that area has a peculiar Z-shape configuration including turns of 120° at the east (La Jolla Scenic Way) and west (Cliffside Ave). See Appendix 2. This configuration is inherently unsafe due to restricted visibility, a peril that will be exacerbated by the student center traffic. Planned use of the vacated right of way by the proposed project includes narrowing the landscape pavement on the 8900 block, making a roadway with dangerous blind corners more dangerous still. Such development will open the City to liability judgments for capricious action resulting in an unsafe traffic condition.

39. Omission 3. Violation of the La Jolla Shores Planned District Ordinance. The recirculated DEIR does not recognize that the proposed development violates the LJPDO. The Ordinance is clear; university facilities do not belong in the single family residential area.

40. Omission 4. Site's required use and dedication of La Jolla Scenic Way. Open space on the site is required as mitigation of development on Gilmor Dr. Driveway access to the project on La Jolla Scenic Way violates the dedication of La Jolla Scenic Way.

41. Omission 5. Traffic Impact Analysis' failure to consider cumulative effect of Venter Institute. The JC Venter Institute is currently under construction on UCSD land on the corner of Torrey Pines Rd and North Torrey Pines Rd. The Institute is immediately across Torrey Pines Rd. from the proposed IICL. The Institute structure includes forty-five thousand (45,000) square feet with corresponding vehicular traffic on the adjacent La Jolla Village Dr and Torrey Pines Rd. The Traffic Impact Analysis takes no account of the cumulative effect of IICL and the Venter Institute.

Thank you very much for your personal patience and professionalism in this matter. Thank you for noting these inaccuracies and omissions in the DEIR. The violations of the Municipal Code and La Jolla Shores Planned District Ordinance should be noted so that the San Diego Planning Commission and the San Diego City Council can validly deny the project.

Yours truly,

Ross M. Starr

La Jolla Community Planning Association Page 13 of 22
Appendix 1: Hillel of San Diego Description and Mission Statement (from http://ucsdhillel.org/about, January 26, 2013)

About

Hillel of San Diego, accredited by Hillel: the Foundation for Jewish Campus Life, serves an estimated 5000 Jewish undergraduate and graduate students at institutions of higher education across San Diego County. Students from all backgrounds are invited to participate in Jewish life on campus. Social, cultural, educational, and community service programs provide opportunities for students to build relationships with each other and develop Jewish community.

Hillel of San Diego Mission Statement

To be a vibrant Jewish campus presence and to involve the maximum number of university-age Jews in ways that foster a lasting commitment to Jewish life.

To further this mission, we commit ourselves to the following goals:

- Serving the needs of individual Jewish students
- Creatively engaging and empowering Jewish students through personal interactions and compelling programs
- Building a strong sense of belonging and Jewish identity
- Nurturing intellectual and spiritual growth in a pluralistic community
- Advocating for Jewish student needs on campus and in the community
- Linking the campus community to the larger Jewish community, locally and globally
- Helping students cultivate a closer connection to Israel
- Developing a campus and organizational culture in which the quality of the relationships attracts involvement.
TO: LA JOLLA COMMUNITY PLANNING ASSOCIATION
FROM: JULIE HAMILTON
SUBJECT: RESPONSE TO DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
UCSD WIESEL CENTER FOR JEWISH LIFE
DATE: FEBRUARY 27, 2013

Public Notice of Availability

42. The public notice fails to provide an accurate and stable project description. The public notice fails to describe the project as a student center and fails to describe the vacation of public rights-of-way that is part of the project. The project description in the public notice and throughout the DEIR describes the two sites as .2 acres and 8 acres – is the site of the site with or without the ROW vacation? The site should be described without the vacation since the vacation is part of the proposed project.

43. Availability of the Draft EIR and all supporting documents is confusing; the notice states the documents are available at the Development Services Center, but requires the reader to return to page two and look for the location of the Development Services Center. The notice fails to state the Draft EIR is also available for public review at the Downtown Library and the La Jolla Branch Library (this is explained at Executive Summary of the DEIR – but with no notice of this availability, the public would have no way of knowing the DEIR was available at the libraries).

Summary

44. S.1 - The Project Synopsis again fails to provide an accurate and stable project description. The synopsis fails to describe the project as a student center and fails to include the vacation of public rights-of-way in the project description.

45. S.4.2 - Project Objectives artifically manipulate outcomes by setting a goal of locating the facility within walking distance of the southern portion of the UCSD campus – why the southern portion? Do more Jewish students attend classes and live along the southern edge of UCSD, including this location within the project objectives prejudices the feasibility of an alternative site.

46. S.5 - The project alternatives do not provide a reasonable range of "feasible" alternatives that would reduce or avoid significant impacts. As an initial point, the DEIR lists the only significant impacts are noise (impact of noise from La Jolla Village Dr. on the facility), biological resources (nesting egrets), and paleontological resources. The DEIR fails to recognize significant impacts on Land Use, Transportation/Circulation/Parking, or Visual Effects and Neighborhood Character. With the DEIR failing to recognize significant impacts in key issue areas; there is little need to provide alternatives and/or mitigation measures that reduce those impacts.
47. The "Reduced Project" alternative does not result in a reduced project: it eliminates the Library/Chapel and the second floor of the Student Center, but retains the use of 976 Cliffridge for the Student Center. This alternative results in a larger student center than the proposed project. It may reduce impacts on community character through a reduction in structure size but it does not reduce the parking impact because the square footage is more than proposed. This impact also does not reduce traffic impacts or land use impacts. In addition, there is nothing to prevent future expansion of the center.

48. The "Site 675" alternative is a red herring. As an initial matter, the DEIR fails to adequately describe the location or existing setting of that site. There is no map within the DEIR showing the location of the site. The site location described is deceptive in that it leads the reader to believe the site is located at the corner of Gilman Drive and La Jolla Village Drive. In fact, Site 675 is located more towards the middle of the block along La Jolla Village Drive between the theater district and La Jolla Village Dr. It is unlikely this is the only alternative site within walking distance of UCSD. Regardless, this site is steep and small - it does not meet the standards for an alternative site.

Project Description

49. The EIR must contain an accurate, stable and consistent project description with sufficient specific information to allow a complete evaluation and review of the project impacts. The EIR must consider the "whole of the project" and include foreseeable future activities that are a consequence of project approval.

50. The project description is not accurate, stable and consistent. The project description is confusing and difficult to read throughout the different sections of the DEIR including the notice of availability, summary and DEIR. The project description repeatedly fails to recognize the project as a student center, minimizing any references to the purpose of the project to serve the students of UCSD. The size of the site is described as 2 acres for 876 Cliffridge and 8 acres for Site 675 - is that the size of the site before or after the vacation?

51. The site location should be described with the same prior to the vacation consistently throughout the document. The project description should accurately describe the vacation of public right-of-way and provide a numerical value to the amount of land acquired through the vacation.

52. The project description for the Existing Improvements Option varies between the notice of availability (religious programs), project synopsis (administrative offices, one-on-one counseling, and meetings with students, p.8-1), and project description (permanent office and administrative use, p.2-15). The Cliffridge property is currently used for administrative offices; a use that is not allowed in the single family zone of the La Jolla Shores Planned District.

53. The project description relies on artificial limitations on the number of students using the student center by stating "attendance would not be expected to exceed 100 persons at any one time," p. 3-19. CEQA requires the project description include all reasonably foreseeable...
activities, meaning the project description must rely on the maximum capacity of the proposed student center rather than artificial limitations on attendance with no means of enforcement.

The project description fails to describe all required discretionary approvals. Figure 3-1 includes a note that a lot consolidation parcel map will be required, but the project description fails to list or describe this discretionary approval. The project description describes the existing and proposed use of the Clifford Property as administrative offices; use of this property for administrative offices will require an amendment to the La Jolla Shores Planned District Ordinance.

The figures in the DEIR have all been reduced from larger figures—-even when expanded the figures are difficult to read and evaluate.

Environmental Setting

The description of the existing environmental setting sets the baseline for measuring changes to the environment that will result from the project and determining whether the environmental effects are significant. The environmental setting should be set at the time the project was initiated—prior to Helix’s efforts to purchase the land for the sole purpose of construction of the student center, in 2000. At that time Site 073 was designated for open space. The Clifford property was not used for administrative offices, and there were significantly more trees on the property providing a more suitable environmental for raptors.

Environmental Impact Analysis

LAND USE

The land use section assumes the project site is designated residential in the Community Plan, however when the project was initiated the project site was designated open space.

The Existing with Improvements Option would allow a non-conforming use (administrative offices) within the single family residential zone of the La Jolla Planned District. The DEIR fails to acknowledge the significant land use impact caused by allowing a use that is not permitted in the zone.

The proposed deviation for the Existing with Improvements Option would allow six parking spaces in a zone that is specifically regulated to prevent the excessive paving of single family residential lots to provide more parking than typically warranted for a single family residence. This is a significant land use impact directly caused by allowing a non-conforming use. Should the Clifford Property be abandoned by Helix in the future, this will create a non-conforming residence specifically disallowed in the Campus Impact Overlay zone. This is a conflict with the "mini-dorm" regulations adopted by the City of San Diego to preserve the character of the single family neighborhoods located in proximity to the three major universities.
in the City of San Diego. The proposed deviation will result in a significant land use impact due to its inconsistency with the land development code.

59. The DEIR fails to recognize the inherent conflict in determining the proposed student center as a “building of a permanent nature, primarily used for religious purposes” but not requiring the project to comply with the parking requirements for religious institutions in the land development code. Either the project is not “building of a permanent nature, used primarily for religious purposes,” thus causing a significant land use impact; or the project has failed to comply with the land development code parking requirements for religious institutions also causing a significant land use impact.

60. The DEIR fails to consider the significance of allowing a student center with a religious affiliation into a single family zone where no other student center has been allowed. Approval of the student center may set a precedent to allow over 50 student organizations with religious affiliations at UCSD to also build or occupy structures within the single family zone of the La Jolla Shores Planned District.

61. The DEIR fails to consider the impact of allowing a 6,500 square foot student center across a narrow road from low profile, low density single family residences. The introduction of the student center introduces a level of noise and activity that does not currently occur in this single family residential neighborhood. The vacant lot is not used to host events for 100 people and few other structures in the immediate vicinity are designed to accommodate more than 100 people with hours of operation from 7:00 am to 11:00 pm. No other development in the immediate vicinity presents a 100 feet unbroken wall directly across from single family residences. The DEIR fails to consider the significant impact on the surrounding community by allowing the incompatible use of a student center in a single family residential neighborhood.

62. The proposed project is not consistent with the La Jolla Shores Design Manual which is an integral part of the La Jolla Shores Planned District Ordinance. Per the City’s threshold of significance, this inconsistency with the La Jolla Shores Design Manual and La Jolla Shores Planned District Ordinance is a significant land use impact.

63. The DEIR appears to rely on consistency with some of the goals, policies and objectives of the applicable land use documents to justify ignoring or failing to comply with all of the land use goals, policies and objectives. Although some aspects of the student center may be laudable—this does not forgive or nullify the significant impacts caused by development of the student center. Inconsistency with these goals, policies and objectives should be the crux of the land use analysis in the DEIR.

TRANSPORTATION, CIRCULATION AND PARKING

64. The study area fails to encompass all affected streets—the analysis should also include impacts to Glanbrook Way as this road will likely be used as a by-pass due to the construction of the Center. Institute and the right-turn only limitation out of the student center.
The study fails to provide traffic volumes for existing conditions on Cliffridge Avenue and Greenbrook Way that are necessary to set a baseline against which to compare the effects of the student center.

Although the DEIR discusses a bus stop at the project site and transit service in the La Jolla Community and at UCSD – the DEIR does not provide detail on transit and shuttle service specifically to the bus stop. Without knowing what transit routes are served by the bus stop and how frequently, the DEIR fails to set the necessary baseline against which to compare the project.

The traffic impact analysis relies on artificial limitations on attendance at the student center and fails to evaluate the reasonably foreseeable use of the student center based on maximum capacity. Therefore the analysis does not adequately evaluate the impact of the proposed student center on transportation/circulation/parking.

The traffic impact analysis does not comply with the standards identified in the City’s Traffic Impact Study Manual and relies on a flawed methodology for determining trip generation rates. Therefore the analysis is flawed and fails to identify significant impacts to transportation/circulation/parking.

There is no basis for the conclusion that 80 percent of the students attending the student center would walk and the remaining 20 percent would arrive with two students per vehicle. These values grossly underestimate the number of vehicle trips generated by the project and the amount of parking required. The methodology and values are not consistent with the methodology and values established by the City’s established policies and procedures and grossly underestimate the impact of the project on transportation/circulation/parking.

The traffic impact analysis failed to consider traffic generated by the Venter Institute, a major facility under construction directly across Torrey Pines Road from the project site. Therefore, the traffic impact analysis fails to adequately analyze the impact of the project on transportation/circulation/parking.

The DEIR fails to acknowledge the project site is located in the Parking Impact Overlay Zone within the analysis of transportation/circulation/parking; therefore the DEIR fails to set the necessary baseline against which to compare the proposed project. The proposed project does not provide the parking required by the land development code in addition to removing 8 existing on-street parking spaces. For religious institutions, the land development code requires 1 parking space for every 3 fixed seats or 30 parking spaces for every 1,000 square feet of assembly area. The project is providing 27 parking spaces for a 6,500 square foot student center. The figures in the DEIR show 120 seats requiring a minimum of 40 parking spaces. The project description anticipates events drawing 300 people, indicating some assembly area within the student center. There are at least four potential assembly areas within the project requiring at least 36 spaces per every 1,000 square feet. Assuming less than 5% of each building will be used for assembly area during significant events – the project provides at least 1,600 square feet of...
assembly area requiring 48 parking spaces (not including any outside assembly area). The proposed project does not meet either standard and includes only 27 parking spaces. The project also requires the removal of 8 on-street parking spaces. Therefore, the proposed project will result in a significant impact on parking.

72 The project description fails to accurately describe the proposed vacating of right-of-way and fails to acknowledge the vacating would reduce the existing street width by two feet measured curbs to curb. 73. The traffic hazards section failed to analyze the impact of a narrower street on traffic safety given the irregular curve radius at the intersections of La Jolla Scenic Way and La Jolla Scenic Drive North, and La Jolla Scenic Drive North and Cliffridge Avenue. Local residents have provided substantial evidence of the hazard of narrower streets in this congested area. 74 In addition, the DEIR has failed to consider the hazard created by placing the project driveway within 150 feet of La Jolla Village Drive. There are two left turn lanes merging from westbound La Jolla Village Drive onto southbound La Jolla Scenic Way. These lanes merge into one lane on La Jolla Scenic Way in the vicinity of the project driveway. This creates a significant traffic conflict at the project driveway and will have a significant impact on transportation/ circulation/parking.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

75 The existing conditions description fails to note the residential development to the east of the project across La Jolla Scenic Way is at a significantly lower elevation; this creates an improper baseline against which to compare the project. Similarly, the existing conditions fail to note the theater district at UCSD is screened from the project site and adjacent residential neighborhood by elevation changes and substantial vegetation. The DEIR intentionally misleads the reader to believe the existing conditions are such that a comparison of the project will show no visual impact.

76 The DEIR fails to consider the design policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan.

77 This section is organized in a manner that makes it difficult to consider the overall impact of the project because the section is broken up by element. Regardless, the DEIR fails to consider the visual impact of a 100 foot wall along the southern property line that is most visible to the existing single family residential neighborhood.

78 The proposed project presents large buildings totaling 6,500 square feet in a neighborhood characterized by single family residences that are typically less than 2,500 square feet. Two of the buildings present sheet walls along the street frontage of La Jolla Scenic Drive North, across a narrow residential street. The single family residential development directly across the street consists of single-story residences with varied front facades. A few residences have a partial second story set back from the front yard. The proposed buildings are visually strong and contrast severely with the single family residences located directly across the street. The project does not conform to the general design and build of the adjacent buildings and does

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LETTER

not promote harmony in the visual relationships and transitions between new and older buildings. Therefore, the student center will have a significant visual impact.

The project proposes a two-story, 6,500 square foot student center in a single family residential neighborhood characterized by single story residences on large lots with varying front yard setbacks. The proposed site is a visually prominent site located at the entrance to UCSD and the La Jolla Highlands. The proposed project presents a significant visual contrast to the surrounding single family residential community and places a large institutional structure on a vacant lot that is essentially the entrance to the La Jolla Highlands neighborhood. There is no evidence to support the conclusion that the project will not have a significant impact on the visual quality of the area and the community character. This is particularly ironic given the efforts of the three religious institutions in the neighborhood to minimize their impact on the visual quality and community character of the neighborhood.

Significant Unavoidable Environmental Effects: Irreversible Changes

The DEIR fails to recognize and acknowledge significant impacts on Land Use, Transportation/Circulation, Parking, and Visual Effects and Neighborhood Character.

Growth Inducement

The proposed project is a student center with a religious affiliation attempting to be categorized as a building of a permanent nature, used primarily for religious purposes. In addition, if the Phase I/Phase 2 project is not approved, the DEIR characterizes the administrative offices of this student organization as a building of a permanent nature, used primarily for religious purposes. If this interpretation of the La Jolla Shores Planned District Ordinance is allowed, it will set precedence for allowing any student organization with a religious affiliation to follow suit. There are more than 20 similar organizations at UCSD, all of which could propose a similar project in this neighborhood. Therefore, the proposed project will have a significant growth inducing impact because it allows a use not previously allowed in this zone.

Cumulative Impacts

The DEIR fails to consider the Ventana Institute located directly across Torrey Pines Road from the project site. Therefore, the cumulative impacts analysis is incomplete.

Project Alternatives

CEQA requires the DEIR evaluate a reasonable range of alternatives that would feasibly attain the project objectives but would avoid or substantially lessen the significant effects of the project. The stated project objective of locating the project along southern portion of UCSD artificially limits the consideration of alternative sites. There is no justification for this limitation as it does nothing to promote the objective of serving students where they live and attend classes. There is no evidence that Hilltop students only live and attend classes along in the

RESPONSE
southern portion of UCSD. In fact, housing is provided in several areas on and adjacent to the campus and is not limited to the southern portion of the campus.

83. The DEIR fails to provide a reasonable range of alternatives and fails to provide a viable alternative site. The alternative site discussed is a red herring in that it is essentially a steep hillside between La Jolla Village Drive and the theater district at UCSD. The alternatives analysis fails to provide the information necessary for the public to adequately consider the site as there is no figure showing the location of the alternative site.

84. The reduced project alternative does not result in a reduced project in that the combination of the reduced project and the Cliffridge Property results in a larger project than the proposed project.

85. The DEIR fails to acknowledge significant impacts to land use, transportation/circulation/parking and visual effects and neighborhood character—therefore the DEIR fails to consider feasible alternatives that eliminate or substantially reduce those impacts.

Mitigation, Monitoring and Reporting Program

86. The DEIR fails to provide mitigation measures that would eliminate or substantially reduce significant impacts to land use, transportation/circulation/parking and visual effects and neighborhood character.
BB-1 The design of the project does not negatively affect the La Jolla Village Drive/Torrey Pines Road intersection. Furthermore, the traffic study (Figure 7-2) shows that the project would add only two peak hour trips to the subject intersection, which amounts to one trip every 30 minutes, a very small amount.

BB-2 There are bike lanes on La Jolla Village Drive along the project frontage so commuter bikers are not expected to utilize the proposed path the project is providing. Rather, it would be used by recreational bikers. Pedestrians and bicyclists arriving at the La Jolla Village Drive/Torrey Pines Road intersection will be able to use the controlled crosswalk at the Torrey Pines Road/La Jolla Village Drive intersection to cross these two streets safely.

Discussion of the UCSD Bicycle and Pedestrian Master Planning Study was added to the recirculated EIR (December 2013). As discussed in EIR Section 4.2.1.2(a), the study identifies improvements at the intersection of North Torrey Pines Road and La Jolla Village Drive, including the following:

- Improve bicycle and pedestrian amenities at intersection, including adding missing crosswalk.
- Install bicycle detection in all appropriate lanes and install Type D limit line detector loops.
- Modify signal timing to accommodate minimum green splits for cyclists.

The project would not conflict with any of these conceptual improvements.
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<td><strong>BC-1</strong></td>
<td>The City as Lead Agency followed EIR noticing requirements under CEQA Section 15087 of the CEQA Guidelines. The Notices of Availability of the recirculated document was distributed to agencies, organizations, and individuals who were known to have an interest in the project. In addition, the notice was published in the San Diego Daily Transcript. The notice included a website indicating where the EIR could be found.</td>
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<tr>
<td><strong>BC-2</strong></td>
<td>The City of San Diego maintains several layers of land use policy. The General Plan establishes broad land use categories for all areas within the City limits. The City’s General Plan land use and policy is further implemented through various community plans, which provide more refined land use categories and policy relevant to their respective communities. The City’s zoning ordinance implements land use designations with standard City zones, which provide both use and development standards for individual parcels with the City. The project site is designated as “low density residential” by the La Jolla Community Plan. As detailed in Section 2.5.4 of the EIR, some portions of the City are not subject to the citywide base zones, but are governed by specific planned district ordinances. Chapter 15 of the Municipal Code contains regulations pertaining to Planned Districts. Development of the project site is subject to the development regulations of the LJSPD. The project site is within the “single-family” zone in the LJSPD. Pursuant to California Government Code § 65103, the City is required to “implement the general plan through actions including, but not limited to, the administration of specific plans and zoning and subdivision ordinances.” The “single-family” zoning of LJSPD ordinance is consistent with the City’s General and Community Plan land use designation for the site.</td>
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<td><strong>BC-3</strong></td>
<td>The existing conditions describe the project site within the surrounding area (adjacent uses) of the project site to provide a basis for understanding the context of the project site. From the center of the project site, the institutional uses described in the EIR are approximately 350 feet to the north, while the residential uses are 150 feet to the south.</td>
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EIR Section 4.12 describes the visual effects of the project within the context of both the immediate and broader area. The specific analysis in EIR Section 4.12.4 analyzes the bulk and scale of the proposed structures in the context of the neighboring community.

The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

There are no residences located to the west of the project site. The residences east of the project site are more than 150 feet east of the project site and are shielded by large stands of trees. In addition, the project would provide trees along the eastern perimeter of the site, along with walls to shield the parking area.

Furthermore, as described in EIR Chapter 3, regular hours of operation would be between Monday through Friday, 9:00 a.m. to 10:00 p.m., but generally the facility would only be open during the evenings and on weekends if there is an activity planned at such times. The lighting during these activities would not be excessive.
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<td>BC-5 (cont.)</td>
<td>In summary, the interior lighting of the project would not spill over to residences more than 150 feet away that would be heavily shielded by trees. No impact would occur.</td>
</tr>
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<td>BC-6</td>
<td>The comment regarding the owner of the Cliffridge property does not raise a substantive issue related to the adequacy or accuracy of the EIR. No further response is required.</td>
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<td>Pursuant to CEQA, the decision makers could choose to approve the Existing with Improvements Alternative in lieu of the proposed project.</td>
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<td></td>
<td>Either the Phase 1/Phase 2 or the Existing with Improvement Alternative is selected, the project would be an allowed use at this location. Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “...is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”</td>
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<td>As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.</td>
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<td>BC-7</td>
<td>The pending code violation relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support the current use. The issue is intended to be resolved in connection with approval of the proposed project. With respect to the use allowed within the zone, see response to comment BC-6.</td>
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<tr>
<td>BC-8</td>
<td>The home would revert to a private residence. It is unknown at this time under what conditions the home would be occupied (sale, lease, etc.).</td>
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<tr>
<td>BC-9</td>
<td>The commenter is confusing the component parts of the proposed project. The Phase 1/Phase 2 project requires a ROW vacation for a portion of the project site along La Jolla Scenic Drive North as well as a street vacation to reconfigure the cul-de-sac to connect with Cliffridge Drive. The reconfiguration of the cul-de-sac would have no effect on the exiting garage. Under this scenario, when the Cliffridge house is returned to a residential use, it would continue to take access from the existing driveway on Cliffridge Drive. The Existing with Improvements Alternative does not require the ROW/street vacation. The alternative is not subject to the Campus Parking Overlay Zone or Maximum Paving and Hardscape regulations. The Final EIR has been revised to remove all discussion related to this issue.</td>
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The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City's Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.

The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project's consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

See response to comment BC-6.
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<td><strong>BC-13</strong></td>
<td>The recirculated EIR (December 2013) was revised to clarify the use. See response to comment BC-6.</td>
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<td><strong>BC-14</strong></td>
<td>Mr. Steele’s comments addressed the difference between a facility used for large-scale religious gatherings and a smaller facility that would provide religious space to smaller groups of students. This speaks in no way to the religious nature of the use. See the response to comment BC-6.</td>
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<td><strong>BC-15</strong></td>
<td>Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.</td>
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As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.
Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
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<tr>
<th>BC-16</th>
<th>Showers are included in the design for Phase 1/Phase 2 in order to encourage cycling. The Phase 1/Phase 2 project would not have large gatherings, nor would any overnight activities occur. As detailed in EIR Section 3.4.2.1(a), Hillel’s regular hours of operation would be between Monday through Friday, 9:00 a.m. to 10:00 p.m., but generally the facility would only be open during the evenings and on weekends if there is an activity planned at such times.</th>
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<td>BC-17</td>
<td>As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site. The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.</td>
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<td>BC-18</td>
<td>The project is as proposed and described in the EIR. See response to comment BC-17. Any future expansion would require additional discretionary review and is speculative at this time. Because this comment does not raise a substantive issue related to the adequacy or accuracy of the EIR, no further response is required.</td>
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<tr>
<td>BC-19</td>
<td>A conditional use permit would not be required as the project would be an allowable use within the LJSPDO. See responses to comments BC-6 and BC-17.</td>
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| BC-20  | With respect to trip generation for the proposed project, as detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.

To evaluate a worst-case scenario, the traffic engineers conducted a subsequent analysis assuming that all PM peak hour users of the site drove solo to the site. This worst-case analysis revealed that
adequate Levels of Service (LOS) are calculated at each of the key intersections using the “100 percent drive” assumption. No significant impacts to the circulation system would occur.

See responses to comments BC-3 and BC-4.

See response to comment BC-20. Furthermore, the percentage of students who live on campus at these three universities are very similar. According to each university’s website, 45 percent of students reside on campus at UCSD, 38 percent of students reside on campus at UCSB, and 35 percent of students reside on campus at UCLA.

The specific zoning of other jurisdictions is not relevant to the analysis of the project as it is an allowed use within the City’s Municipal Code. See response to comment BC-6.
Please Compare the Locations of Hillel Student Centers

I respectfully ask you to comply with the planning decisions that other California cities have made when they placed Hillel facilities. Not one California community with a comparable UC campus has deliberately broken the single-family-only character of a long-standing residential neighborhood by interjecting a high-use student facility at such close range. The San Diego Hillel proponents may cite Santa Barbara, Berkeley and UCLA Hillel facilities as having comparable use and traffic patterns, but this is mistaken. These facilities have all been located where their high usage cannot impose upon their immediate neighbors. Not one is in a single-family residential zone! I have seen these all with my own eyes!

- The Reutlinger Center at UC Berkeley, at 2736 Bancroft Way, is surrounded by University buildings and fraternity houses, across from Boalt Law School and Simon Hall; it is just below International House and more fraternities. Behind it are more fraternities and a multi-residential apartment building. Mixed-use zone – R-4-H, restricted by city codes, ordinances and community restrictions.
- The UCLA Hillel Center at 574 Hilgard Avenue is bordered by a Christian Community Center on one side and a large church and parking lot on the other. Several-story apartment buildings continue along Hilgard. Mixed-use zone – QR4-1, VL (multiple dwelling zone).
- The Milton Roiiman Jewish Center at UC Santa Barbara at 781 Embarcadero del Mar; Isla Vista is surrounded by multi-residential buildings. – SR-H-20 special zone; part of the UCSB student community plan. The County of Santa Barbara records state that the “…Hillel facility would serve...students on a daily basis as desired by the individual, and thus, Hillel’s location in the SR-H zone district and its operation under a conditional use permit is appropriate”.
- The Hillel center at UC Santa Cruz, at 222 Cardiff Place off the High Street sits between the commercial establishments of a 7-11 and a Slug Books. The commercial strip-mall also includes a bank and parking for all these businesses. Mixed-use zone.
- The Hillel Center, UC Irvine, at 1 Federation Way. Hillel shares the Samuel Jewish Center facility and huge parking lot, at the far end of a very long and wide dead-end enclave reserved for other large facilities and at a considerable distance from any home developments. Mixed-use zone.
- The Student Life and Leadership Center at UC Riverside, at 244A Cisto Hall which includes Hillel; situated right off campus Commons which houses offices and game rooms. Across from Physical Education Building. Mixed-use zone.

All these Hillel Student Centers serve their membership very well and also serve their communities very well. They have no undue constraints on their programming because they exist among other high-use facilities. Please acknowledge the wisdom of these other communities, do the same planning in San Diego.
Richard Attiyeh
8961 Nottingham Place
La Jolla, CA 92037

February 6, 2014

E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1223 First Avenue, MS 501
San Diego, CA 92101

SUBJECT: UCSD Hillel Center for Jewish Life – Project No. 212995

Dear Ms. Shearer-Nguyen:

I am writing to provide my comments on the draft Environmental Impact Report (EIR) for the proposed UCSD Hillel student center. My comments are as follows:

Section 1.2 Project Objectives

- The EIR emphasizes the religious aspects of the student center’s mission. But if one looks at the website of Hillel: The Foundation for Jewish Campus Life (www.hillel.org), it becomes clear that Hillel’s focus is primarily cultural, not religious. The following is from the “About Hillel” section of this website:

  Our Mission: Enriching the lives of Jewish students so that they may enrich the Jewish people and the world.

  Our Vision: We envision a world where every student is inspired to make an enduring commitment to Jewish life, learning and Israel.

  There is virtually nothing on the website that emphasizes religious activities as a primary function of Hillel. It is clear that although Hillel has a religious affiliation, a Hillel student center is not equivalent to a synagogue for college students and does not meet the requirements of the La Jolla Shores Planned District Ordinance for location in a single family neighborhood.

- The EIR states that a primary objective of the project is to “contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.” Based on location of campus dormitories, the overwhelming majority of students with campus housing live well over 1/4 mile from the proposed location of the Hillel student center. Only one of UCSD’s six undergraduate colleges – Revelle College – has dormitories located within 1/4 mile from Site 653. The approximate distances of Site 653 from student housing on the UCSD campus would be approximately 0.5 miles.

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

As detailed in Section 3.1 of the EIR, one of the project objectives is to “contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.” The Phase 1/Phase 2 project meets this objective.

As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.
BD-2 (cont.)

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate levels of service are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.
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<tr>
<th>LETTER</th>
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<tr>
<td>BD-3</td>
<td>See response to comment BD-1.</td>
</tr>
<tr>
<td>BD-4</td>
<td>See response to comment BD-1.</td>
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<tr>
<td>BD-5</td>
<td>Any specific request or coordination made in 1977 does not have any bearing on the proposed project. This comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response is required.</td>
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<td>BD-6</td>
<td>See response to comment BD-2.</td>
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<td>BD-7</td>
<td>The project would promote walkability through its location directly across La Jolla Village Drive from the UCSD campus. A signalized pedestrian crossing adjacent to the site provides safe pedestrian access. As detailed in Section 3.0 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” The Hillel staff at the Cliffridge property support the religious programs for Hillel, including helping students plan programming for their religious life, developing religious events and trips, and fundraising for the students to do their religious work. Students visit the Cliffridge property for religious meetings and counseling, and to coordinate different aspects of Jewish life on campus. The kitchen at the Cliffridge property is used to prepare traditional religious dishes or traditional religious meals during religious holidays, and to teach students how to prepare these meals. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the LJSPD Ordinance. Further, under the Phase 1/Phase 2 project, the temporary use of the Cliffridge property would expire upon completion of the project, and revert back to a single dwelling unit use. As an alternative to the proposed Phase 1/Phase 2 project, the Existing with Improvements Alternative is analyzed in detail in Section 9.2.1 of the FEIR. If the Phase 1/Phase 2 project is not approved, Hillel would permanently use the Cliffridge property to provide for religious programs for Jewish students at UCSD. Therefore, under the Existing with Improvements Alternative the site would be used primarily for religious purposes. This is an allowable use in the Single-Family Zone, in accordance with the LJSPD Ordinance.</td>
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As detailed in EIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the traffic impact analysis did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate LOS are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. See EIR Table 4.2-8.

The project adds less than 10 peak hour trips to the section of La Jolla Scenic Way. A car less than every 6 minutes would not create congestion or increase the accident risk.

A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way...
is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

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<th>BD-10 Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for &quot;churches and places of religious assembly.&quot; This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being &quot;seats,&quot; &quot;pew space,&quot; and/or &quot;assembly area.&quot; The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.</th>
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<td>As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.</td>
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Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

See response to comment BD-10.
CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.

See response to comment BD-12.
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<td>BD-14 As detailed in EIR Section 9.2.4, the Site 675 Alternative has access constraints and would not reduce physical impacts to the environment when compared to the Phase 1/Phase 2 project, including to biological resources.</td>
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<td>BD-15 See responses to comments BD-12.</td>
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Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, "Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD." As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose "...is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a
detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

With respect to precedent setting, see response to comment BE-1.

See responses to comments BE-1 and BE-2.
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| BF-1: Maarten and Janet Chrispeels  
8703 Glenview lane  
La Jolla, CA 92037  
La Jolla, CA  
February 2, 2014.  
Ms. E. Shearer-Nguyen  
Environmental Planner  
City of San Diego Development Services Center  
1222 First Avenue, MS501  
San Diego, CA 92101  
DSDEAS@sandiego.gov.  
About: UCSD Hillel Center for Jewish Life (previously known as Hillel of San Diego Student Center II), Project No. 212995, second recirculated DEIR.  
Dear Ms. Shearer-Nguyen,  
Thank you for providing the second Recirculated Draft EIR, which I will refer to as the RDEIR. I commented on the previous draft and am happy to do so again. My wife and I have lived in this neighborhood since 1967 (first on Cliffridge avenue, almost adjacent to the planned facility, and now on Glenview lane) and have watched it change and evolve. Some homes have been upgraded, but all have kept their changes within the spirit of a family neighborhood. That is what we, and all our neighbors, want. Our neighborhood consists mostly of owner-occupied homes with very few rentals. It is a traditional American family neighborhood. Let’s keep it that way. |
| BF-1: This comment does not raise an issue relating to the content or adequacy of the EIR. No further response is required. |
| BF-2: The proposed project provides primarily a religious function and is an allowed use at this location. Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “. . . is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”  
As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code. |
| BF-2: It is truly unfortunate that for 15 years now the Hillel foundation has battled to propose a change in the nature of our neighborhood and propose a structure that is not at all in keeping with its surroundings and would set an undesirable precedent. There is no doubt that the Jewish UCSD students who want to have a social center deserve to have one reasonably close to the campus. It seems that the RDEIR de-emphasizes the social function of the proposed center and emphasizes its religious functions. That is perhaps why the name was changed? It is my understanding that there are already several Jewish religious venues in relatively close proximity to UCSD. Furthermore, by portraying the Hillel center in this way I wonder if this is fully in accordance with Hillel’s own statement of purpose. |
| BF-3: Although the size of the whole facility has been scaled down, the sizes of the assembly room, kitchen and bathrooms clearly indicate that it will be a place to hold relatively large evening gatherings and dinners on a regular basis. We see this as greatly impacting the traffic and parking in our residential streets. Parking in the neighborhood of the theaters is limited on the many evenings that there are performances with a little spill-over onto Cliffridge. Few people are willing to walk, apparently. It is therefore likely that Hillel parking for its daytime and evening activities will be on the streets adjacent to the center. Traffic on Cliffridge has already increased substantially in the past few years as |

With respect to setting a precedent, Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.
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<td>BF-2 (cont.) While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use. The project name was changed to clarify the project as permanent facility used primarily for religious purposes.</td>
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<td>BF-3 EIR Section 3.4.2.1(a) details the projected activities that would occur at the Phase 1/Phase 2 project. The ADT on Cliffridge Avenue is less than 1,500, which is well within its carrying capacity. Potential traffic and parking impacts associated with the facility are analyzed in EIR Section 4.2.</td>
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LETTER

more and more people use it as a shortcut to get to Gilman or the freeway. Apparently they are not willing to wait at the traffic light at the corner of Torrey Pines and LJ Village drive because of the no turn on red sign. More parking + more traffic = more congestion.

I am concerned about the precedent this Center for Jewish Life will create. A foundation has the means via a donor to buy two adjacent residential properties and then uses excellent architects, lawyers and PR consultants to design a “facility” that the neighbors don’t really want, because it does not fit into the neighborhood. Nevertheless the Foundation is able to shepherd it through the planning process. You can be sure that when one sheep is over the dam, more will follow. Surely, the city planners are well aware of the neighborhood around SDSU and how it has been impacted by all kinds of facilities.

As I said last time, it is an elegantly designed structure and I would love to see it built in a place where such a center is appropriate. Jewish students would frequent it in the knowledge that their place of gathering, religious observance and celebration was not strongly opposed by the neighbors. We add our voice to those who believe that if the City carries out its own analysis it will conclude that the negative impact of this center is likely to be much greater than is portrayed in the RDEIR.

Sincerely yours,

Maarten and Janet Chrispeels

RESPONSE

BF-4 With respect to precedent setting, see response to comment BF-2. The remainder of this comment regarding the process does not raise a substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

BF-5 The comment expresses the opinions of the commenter, and is a conclusion to the previous comments responded to above. No further response is required.
BG-1 This comment expresses the author’s opinion and does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

BG-2 The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

BG-3 The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

BG-4 Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based
on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.
The EIR adequately evaluates a reasonable range of alternatives as required by CEQA. This comment proposes action outside the CEQA process and does not raise a substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “. . . is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
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Potential noise and air quality impacts associated with the Existing with Improvements Alternative are analyzed in EIR Section 9.2.1. As shown therein, impacts would be less than significant.
Access to the project is provided on La Jolla Scenic Way, rather than La Jolla Scenic Drive North, to prevent conflicts with driveways serving residences located on La Jolla Scenic Drive North. An analysis was conducted of the proposed driveway location, and found traffic safety hazards to be less than significant.

Driveway sight distance is adequate. A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

There are no plans to remove a left-turn lane at the La Jolla Scenic Way/La Jolla Village Drive intersection. There are also no plans to prohibit driveway access on La Jolla Scenic Way. A sight distance analysis was conducted and the driveway meets City standards.
LETTER

the health and safety of students or local residents traveling on La Jolla Scenic Way or exiting from the community and crossing La Jolla Scenic way to the traffic lights at La Jolla Village Drive.

It appears that City Staff do not care to take into consideration the future liability of placing a driveway in such a dangerous location. Or similarly the narrowing of La Jolla Scenic Way in spite of the many warnings from home owners who live on the street, La Jolla Shores Association, I.J CPA. This disregard is criminal.

Does the City Planning Department have future plans to remove the left turn lane to cross La Jolla Scenic Way to the traffic light and La Jolla Village Drive? Does the City also have plans to close the entrance to the community from La Jolla Scenic Way effectively making the short end of La Jolla Scenic Drive into a one-way street?

Please comment.

i. ROW Vacation, Street Dedication, and Infrastructure Easements

As detailed above in Section 3.3.1.3, Phase 1/Phase 2 proposes a ROW vacation, utility easement reservations/dedication, and a street dedication. Figure 3-16 shows the ROW vacation and utility easements. As shown in Figure 3-16, the total area of the ROW vacation along La Jolla Scenic Drive North would total 0.49 acre (21,278 square feet). Within this area, there would be four easements (three for utilities, one for water) that would be reserved from the ROW vacation, discussed in detail below. Phase 1/Phase 2 would also dedicate a 2,183-square-foot area along the northern property frontage along La Jolla Scenic Drive to the public ROW. Figure 3-17 shows the proposed ROW dedication along the northern perimeter of the project site. This area would include a new sidewalk constructed per City standards, native landscaping, and a new bus stop. Phase 1/Phase 2 proposes to narrow La Jolla Scenic Drive North by 2 feet to provide for a 12-foot parkway on the north side of the roadway with increased landscaping. La Jolla Scenic Drive North currently measures 36 feet wide from curb to curb. As detailed in Section 4.2.5.1, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards.

The Street Vacation and cul-de-Sac vacations comes under the Municipal Code.

Comment:

Findings for Public Right-of-Way Vacation

Giving public land to a private entity for its private use in violation of the municipal code and just plain wrong when both the road way and cul-de-Sac are in daily use.

A public right-of-way may be vacated only if the decision maker makes the following findings:

1. (a) There is no present or prospective public use for the public right-of-way, either for the facility for which it was originally acquired or for any other public use of a like nature that can be anticipated;
2. (b) The public will benefit from the action through improved use of the land made available by the vacation;

RESPONSE

BH-6 The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.
3. (c) The vacation does not adversely affect any applicable land use plan; and
4. (d) The public facility for which the public right-of-way was originally acquired will not be detrimentally affected by the vacation.

§126.0941

The Cul de Sac has multiple uses, parking, turnaround area for traffic that often mistakes where they are going and for temporary storage for City trucks and vehicles. See the attached Pdf.

The findings cannot be met.

I wish to point out that if there are accidents on the street related to the narrowing of the roadway, the City could be liable for costs. Safety of students and residents is paramount.

Please Comment.

8.5 Parks and Recreation
As a religious facility, neither the Phase 1/Phase 2 project or the Existing with Improvements option would not result in an increased demand for recreational resources, or increase the use of existing neighborhood or regional recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Neither the Phase 1/Phase 2 project nor the Existing with Improvements option require that recreational facilities be constructed; thus, no impact to recreational resources would occur.

Comment: How short is the Development Services Memory.

For the Record.

Site 653 was designated open space. It was the only open space in the neighborhood. In 2001 there was a RFP issued, a Request For Proposal for Site 653. As the land was designated open space, the community replied with a plan for a pocket park with a fenced small children’s play area. The park was designed by Jim Neri a well known landscape architect specializing in public parks. Money was raised and the pocket park project went through all the La Jolla Planning groups and to Planning Commission in November, 2001; all approved the project. When the project arrived at City Council it became political and the project for a community pocket park was voted down.

The community does not have any open space. This was our one chance to keep the designated open space and have it dedicated for a park.

On May 21, 2002 at the Council meeting to ratify the Community Plan update, the issue of designated site 653 was not on the docket for that day nor was it ever passed. The City Attorney reminded everyone that this item had not been noticed and they

BH-7 The project site was never designated open space. As discussed in EIR Section 3.6.1, the project site was evaluated for potential incorporation into the City’s Park and Recreation Department’s open space inventory in November 2000. However, the parcel did not meet the City’s definition as an open space parcel, as it is “completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value.”

The remainder of the comment does not raise a substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
The comment regarding La Jolla parkland does not raise a substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

BH-8

The comment regarding La Jolla parkland does not raise a substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

BH-9

See response to comment BH-6.
Park, Open Space, and Recreation. The project site is designated as low density residential in the La Jolla Community Plan.

Illegal Removal of designated open space. And refusal of the community's efforts to have a park on site 653.

Please Comment
The project site was never designated open space. As discussed in EIR Section 3.6.1, the project site was evaluated for potential incorporation into the City’s Park and Recreation Department’s open space inventory in November 2000. However, the parcel did not meet the City’s definition as an open space parcel, as it is “completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value.”

The remainder of the comment does not raise a substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
LETTER

Comment:

In 1999 the first hearing of the plan to obtain Site 653 for a student center. City Staff wrongly represented the site as Single Family. The site was proved to be designated open space.

2001 in response to an RFP a request for a proposal, the community submitted a plan for a pocket park on site 653. The plan was supported by all the planning groups in La Jolla and the Planning Commission unanimously voted for a pocket park on site 654. At council it became a political issue and was voted down.

On May 21, 2002 at the Council meeting to ratify the Community Plan update, the issue of designated site 653 was not on the docket for that day nor was it never noticed. The City Attorney reminded everyone that this item had not been noticed and they could only discuss land use for any particular project. The advice was ignored and designated open space was illegally removed from the community plan. That is why there is no open space or pocket park in La Jolla Highlands.

Site 653 has been designated for residential use, with "churches, temples, or buildings of a permanent nature, used primarily for religious purposes" (Municipal Code Section 1510.0303(e) [Single-Family Zone — Permitted Uses]) allowable in the residential zone according to the LJSPO regulations. Ordinances. In 2003, Hillie established its present location at 8478 Cliffridge Avenue—when the Cliffridge property was acquired by a private nonprofit foundation that supported Hillie. The property was renovated and provided to Hillie on a rent-free basis. The site was considered for its religious purposes and mission while development of a permanent space was considered.

The HCJL was originally proposed in 2004 and included construction of an approximately 13,000-square-foot building to establish a permanent location for UCSO Hillie activities. This project also included underground parking and a large community gathering space for Shabbat services and weekly Shabbat programs. Site 653, along with the vacated ROW, was sold by the City to Hillie in 2005 pursuant to City Council Resolution R-301433. The City Council approved a Mitigated Negative Declaration, SDP, Planned Development Permit, and Street Vacation for the construction of the larger Hillie Center in 2008. The Mitigated Negative Declaration was subsequently challenged by project opponents, and the Court of Appeal issued a ruling in 2009 that overturned the project approvals and required the City to prepare an EIR that would include analysis of potential impacts to traffic and parking, biological resources, and aesthetics and community character. The project opponents also challenged the sale and the transfer of the property to Hillie, which were upheld by the Court of Appeals.

4.0 Environmental Impact Analysis 4.1 Land Use

4.1.1 Existing Conditions
4.1.1.1 Existing Land Use Plans and Development Regulations

RESPONSE

BI-2 EIR Section 4.1.1.1 does not indicate that such uses are within the specified La Jolla Highlands community but rather that the project site is surrounded by various types of residential and institutional uses. Institutional uses are approximately 350 feet north of the project site.
The project site contains the Cliffridge property that currently serves as the Hillel office. The remainder of the site is currently vacant. The project site is surrounded by various types of residential and institutional uses. La Jolla Village Drive, a major roadway, and the UCSD campus are situated to the north; La Jolla Scenic Drive North and a single-family residential neighborhood are to the south. To the east lies La Jolla Scenic Way. Further east are multiaspect single-family residences, condominiums, and townhomes.

Comment:
There are no institutions facilities within the La Jolla Highlands single-family residential community.

The Planning Context of the Environmental Setting, Section 2.5 of this EIR, describes the land use plans and development regulations that apply to development of the project. The following provides a brief recount or expansion of the planning context, discussion of selected plans and development regulations, including the City General Plan, La Jolla Community Plan, and pertinent LDC regulations.

a. General Plan
The Land Use and Community Planning Element (Land Use Element) provides policies to implement the City of Villages strategy within the context of San Diego’s community planning program. The element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses, identify site-specific recommendations, and refine citywide policies as needed. The Land Use Element establishes a structure for the diversity of each community and includes policy direction to govern the preparation of community plans. The element addresses zoning and policy consistency, the plan amendment process, airport-land-use planning, balanced communities, equitable development, and environmental justice.

The General Plan Land Use Element identifies the project site in the General Plan’s Land Use and Street System Map (contained in the Land Use Element, Figure LU-2) as Residential. The area of the cul-de-sac is designated as Roads/Freeways/Transportation Page 4.1-1

Page 4.1-3

b. La Jolla Community Plan
The community plan includes objectives and proposals to ensure quality site design consistent with the General Plan and appropriate to the community. Community plans provide the level of information that is needed in order to review and assess proposed public and private development projects. However, community plans are policy documents that do not contain regulatory requirements. Regulatory requirements are addressed below under the LDC and LJSPD Ordinance.

The La Jolla community borders the Pacific Ocean and values the relationship with the ocean’s coastline and other natural elements such as hillscapes and canyons.

P 4.1-4
4.3 Environmental Impact Analysis

According to the Planning Context for the La Jolla Community Plan, approximately 99 percent of the land designated for development has been built upon. With this in
mind, the La Jolla Community Plan area is intended to guide the growth and development of the planning area. Each of the plan elements contains goals focused on protecting environmentally sensitive areas, enhancing public access and public amenities, and maintaining the residential character and important landmarks.

Coastal areas, hillsides, and canyons are precious natural resources identified in this community. Therefore, the first goal of the Natural Resources and Open Space System Element is to protect these natural amenities, including public views and access. In addition, this element recognizes the importance of environmentally sensitive areas and linkages. This element provides an inventory of open space areas, including dedicated open space/park, designated open space/park, and private open space. The project site is not identified as open space according to this inventory, nor is the project site designated as environmentally sensitive, MHPA, or as a public viewshed/corridor.

Comment: La Jolla is seriously under parked.
Environmental Impact Analysis protecting environmentally sensitive areas, enhancing public access and public amenities, and maintaining the residential character and important landmarks.

For 15 years the community of La Jolla have been working to keep Site 653 as open space and have it dedicated. As a reminder, raptors used Site 653 until the City cut down many of the trees.

The pocket park that was designed for this sensitive area was to have use native plants and trees.

An environmentally sensitive area is more important to the community than a student center as witnessed by the consistent voting of the all the community planning groups and the planning commission.

The project site is not identified as open space according to this inventory, nor is project site designated as environmentally sensitive.

Comment:

Since the open space designation was illegally removed by the council in May 2002. See the City Attorney, No noticing. Not on the City docket. Please see a copy of the Council meeting.

4.0 Environmental Impact Analysis 4.1 Land Use
The Community Facilities, Parks and Services Element addresses schools, libraries, public parks, and community services. The goals of this element include: providing adequate facilities, maximizing the use of public amenities and services, and considering design and environmentally sensitive areas in the development of new facilities. Policies are identified for each type of facility.

Comment: La Jolla has been severely short of park space.

BI-4 The comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.
LETTER

4.1.2 Significance Determination Thresholds

Based on the City’s 2011 Significance Determination Thresholds, impacts related to land use would be significant if the project would:

- Require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment;
- Result in a conflict with the environmental goals, objectives, or recommendations of the General Plan or the Community Plan in which it is located; and/or
- Result in land uses that are not compatible with existing or planned surrounding land uses.

Comment:

Hillel’s project would require a deviation and or variance and would in turn result in a physical impact on the environment and safety of the community. Would Result in land uses that are not compatible with existing or planned surrounding land uses.

There would not be a significant amount of inbound or outbound traffic from the parking lot during this phase of the project (i.e., approximately 12–16 trips out of the parking area per day). Thus, due to its temporary nature, this deviation would not result in significant direct or secondary environmental effects. Therefore, impacts would be less than significant.

Comment:

The impact on the single-family residence 8966 Cliffridge Avenue would be heavily impacted by 12 to 16 trips a day from Hillel’s house 8976 Cliffridge Avenue. Think of the noise and impact on the family living next door to Hillel’s parking lot.

Shape Shifting
Changing names UCSD Hillel Student Center to UCSD Hillel Center for Jewish Life

First Line of the first page:

Subject: UCSD HILLEL CENTER FOR JEWISH LIFE First line of the Environmental Impact Report. UCSD is Crossed out.

1 1 change. Bottom of page 5 and top of page 6 HCL Student Center—Student Center struck out.
2 1 change. P.54 Table 1 Phase 1/Phase 2 Building gross Floor Area Summary HCL Student Center struck out.
3 1 change. Page 5 8 HCL Student Center struck out.
4 4 changes. Page 3–20 6 HCL Student Center four 4 mentions Student Center crossed out.

Hillel Name Changes 1999 – 2014

RESPONSE

BI-5 EIR Sections 4.1.3 and 4.1.4 address potential impacts associated with proposed variances and land use compatibility. As stated therein, the proposed deviation is temporary and would not result in secondary environmental effects, such as traffic safety impacts. Due to its temporary nature, this deviation would not result in significant direct or secondary environmental effects.

As discussed in the EIR, both the Phase 1/Phase 2 project and the Existing with Improvements Alternative would be consistent with the land use designation, goals, and policies for the applicable community plan, LJSPD ordinance, La Jolla Shores Design Manual, and development regulations. Impacts would be less than significant.

BI-6 See response to comment BI-5.

BI-7 The project name was revised to clarify that the project is not affiliated with UC San Diego nor is the facility a student center, but rather a facility used primarily for religious purposes.
2001 June 1
Development Services to Mark Steele
Subject: Preliminary Review Hillel of San Diego: for a religious student center off-campus

2003 Dec 31
Site Development Permit / Project No 20140 Hillel of San Diego
Notice of Application. As a property owner, tenant, or person who has requested notice, you should know that an application has been filed with the City of San Diego for a site development permit to change the use of an existing single family residence to commercial office space and demolish existing detached garage / storage building to create additional parking.

2008 July 15, 2008
Hillel of San Diego Student Center (Project No. 149437)
Notice of Public Meeting La Jolla Shores Advisory Board

Project Review, Hillel of San Diego Student Center
(Project No. 149437)

2008 Dec 3, 2008
The City Attorney: Refers to, Hillel of San Diego Student Center Project No 149437
BJ-1  This comment is an introduction and no further response is required.

BJ-2  There is no specific requirement under the CEQA Guidelines to distribute copies of a public review EIR to local libraries; nevertheless, the City did distribute the EIR to the La Jolla Branch Library. The appendices were included as a CD to reduce paper.

The City as Lead Agency followed all DEIR noticing requirements under CEQA Guidelines Section 15087. The Notices of Availability of the Draft EIR were distributed to agencies, organizations, and individuals who were known to have an interest in the project. In addition, the notice was published in the San Diego Daily Transcript. The notice included a website indicating where the Draft EIR could be found.

EIR Section 1.3.1.1 stated the following:

The Draft EIR and all related technical studies are available for review during the public review period at the offices of the City of San Diego Development Services Department located on 1222 First Avenue, Fifth Floor, San Diego, California 92101. Copies of the Draft EIR are also available at the following public libraries:

- San Diego Public Library, Central Library, 820 E Street, San Diego, California 92101
- La Jolla Branch Library, 7555 Draper Avenue, San Diego, California 92037

This EIR is also available for review online at: http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html.

The City provided adequate notice.

BJ-3  As detailed in EIR Section 3.2.2, the project would be used primarily for religious purposes, with a variety of religious programs such as meditation and prayer circles, programs relating to observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel as the Jewish homeland, and other Jewish religious, cultural, and social interactions.

The project objectives identified within the EIR include the underlying purpose of the project and are written in order to help the lead agency develop a reasonable range of alternatives to evaluate, as required within Section 15124(b) of the CEQA Guidelines.
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Ms. Elizabeth Shearer-Nguyen
February 4, 2014
Page 2

and limit other alternatives. Although the Project Description and Project Objectives focus on the religious aspects of Hillel—implying the proposed project is expected to be used primarily for religious purposes—there is no indication in the material provided to the public that the Student Center will be used primarily for religious purposes.

**Environmental Setting:**

Figure 2-3 is outdated in that it fails to show the Venter Institute located west of the project site on Torrey Pines Road.

The Environmental Setting does not describe in sufficient detail the single family residence at 8976 Cliffridge Avenue that is currently occupied by Hillel for administrative offices. The Environmental Setting also fails to disclose that the existing garage at the Cliffridge property has been converted from a garage to administrative offices in violation of the Land Development Code. The description of current uses in the Cliffridge property is not stable and finite. Some sections describe the use as religious purposes while others describe the property as used for administrative offices and one-on-one counseling and meetings with students.

The “Landover” section does not accurately describe the project site and surrounding area. This description of Landover fails to provide the reader with an adequate description of the surrounding area against which to compare the proposed project. Although a reader would not expect to see a description of the surrounding area under Landover, there is no other topic in the Environmental Setting that provides a description of the surrounding area.

**Project Description:**

The non-traditional organization of the Project Description makes it confusing and difficult for the reader to understand the proposed project. The list of discretionary actions is addressed before the project is described; this organization requires the reader to flip back and forth in the document to verify the required approvals.

The programs described in the “Project Background” section are not reflected in the advertising for Hillel, the Mission Statement for Hillel or the Event Log and Calendar for Hillel UCSD attached to the Traffic Impact Analysis.

The list of discretionary actions fails to provide a description of the findings necessary to approve a Street Night-of-Way Vacation.

The DEIR fails to provide an accurate and stable project description. The size of the project varies from 7,084 square feet in the Project Description to 5,772 square feet in the analysis of Visual Effects and Neighborhood Character. The project is described as including a carport with solar panels over the surface parking but the elevations provided do not show the carport and solar panels. The maximum number of visitors anticipated to use the student center at any one time varies between 50 and 100 from section to section. Neither number meets the

| BJ-4 | As required under CEQA Guidelines Section 15125(a):
An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published.

The NOP was published on October 8, 2010. Therefore, the baseline conditions are adequately described. The Venter Institute was not located there at the time the baseline was established. However, the cumulative project analysis has been updated to include Venter Institute in the recirculated EIR (December 2013). See EIR Section 4.2.3.1(a) and Chapter 7 for the analysis that includes this project. Figure 7-1 clearly indicates the Venter Institute as a cumulative project.

Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD. Reference to the administrative offices is within their context as support and for the religious programs.

The City’s Code Enforcement Department issued a violation to the applicant under 2001 Edition CBC Section 3405 stating: No change shall be made in the character of occupancies or use of any building which would place the building in a different division of the same group of occupancy or in a different group of occupancies, unless such building is made to comply with the requirements of this code for such division or group of occupancy.

The pending code violation therefore relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support that use. The issue is intended to be resolved in connection with approval of the proposed project.

Surrounding land uses are described briefly in EIR Section 2.2 and surrounding uses and neighborhood character are described in detail in the Existing Conditions in EIR Section 4.12.1.

The content of Chapter 3 is consistent with the requirements of Section 15124 of the CEQA Guidelines.

EIR Section 3.2.2 Hillel’s five primary areas of programming: Jewish Spirituality, Jewish Living and Learning, Jewish Community Building,
BJ-7 (cont.)
Israel-Oriented Activities, and Community Service. The events identified in the log attached to the Traffic Impact Analysis are consistent with the specified areas of programming.

BJ-8
The required discretionary actions are listed in EIR Section 3.3: SDP for Development within the LJSPD and a deviation requested from Driveway Curb Cut Requirements; ROW vacation for a portion of La Jolla Scenic Drive North between Torrey Pines Road and La Jolla Scenic Way; and Deviation from Parking Regulations to restrict the allowable on-site parking. The decision maker (in this case, the City Council) ultimately decides if the findings for the ROW vacation are met. The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

Findings in and of themselves are not a discretionary action, but rather are associated with the right-of-way vacation. Findings are required to be made in accordance with SDMC Section 125.0941.

BJ-9
The 7,084 square feet identified in EIR Chapter 3 relates to the gross floor area with the phantom floor. The 5,772 square feet stated in Section 4.12 relates to the building net square footage (total square feet of the structure net of bathrooms and closets). Net square footage was used in the discussion of bulk and scale in order to accurately compare the proposed structures to surrounding dwellings.

EIR Chapter 3 accurately describes the proposed project’s development summary, including the carport with solar panels. There are multiple figures in EIR Chapter 3 showing the proposed project’s site plan and development features.

With respect to project occupancy, the Final EIR has been revised to clarify this issue. As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to...
The letter indicates that proposed attendance levels are expected to range between 10 and 50 attendees, with the facility's conservative approach based on accommodating up to 100 visitors during peak hours. However, on limited occasions, the number of attendees at the facility could exceed 100 persons, necessitating the implementation of a Parking Management Plan. Overall, it is anticipated that occupancy could reach between 100 to 150 people up to eight times a year, and up to four times per year occupancy could exceed 150. At no time would the facility's occupancy exceed its maximum permitted by applicable codes.
BJ-10  With regards to attendance figures and facility occupancy, see response to comment BJ-9.

As stated in EIR Section 3.4.2.1, Shabbat services, concerts, high-holiday services, distinguished speaker events, and other large gatherings would continue to be held on campus in rented facilities.

Any future expansion would require an amendment to the permits and additional environmental review. At special events, a Parking Management Plan would be implemented to assure that adequate parking would be available.

BJ-11  EIR Figure 9-1 shows the site plan for the Existing with Improvements Alternative, including the proposed landscaping.

FEIR Section 9.2.1 has been revised to include the following (formerly in Section 4.1):

Because only minor modifications are proposed to the Cliffridge property, the Existing with Improvements Alternative would not conflict with the applicable goals and objectives of the General Plan and La Jolla Community Plan. The Cliffridge property is not located on an environmentally sensitive area, coast/shoreline, or steep hillside; therefore, elements of the community plan and ordinance most relevant to the project are related to the residential character of the project site. The design and exterior of the property is compatible with adjacent residential units and would remain the same; thus, this option would not conflict with the La Jolla Shores Design Manual. Because the Existing with Improvements Alternative would not conflict with the environmental goals, objectives, and recommendations in the General Plan or the La Jolla Community Plan, no impact would result.

BJ-12  The 101 Bus Stop located at the corner of Revelle College Drive & North Torrey Pines Road is located within 0.2 mile of the project site (walking distance).

BJ-13  The City's Code Enforcement Department issued a violation to the applicant under 2001 Edition CBC Section 3405 stating: No change
shall be made in the character of occupancies or use of any building which would place the building in a different division of the same group of occupancy or in a different group of occupancies, unless such building is made to comply with the requirements of this code for such division or group of occupancy.

The pending code violation therefore relates to the change to religious use of the Clffridge property, as opposed to a single dwelling unit use, and modifications required to support that use. The issue is intended to be resolved in connection with approval of the proposed project.

The project description accurately reflects the proposed project. Any future activities would require an amendment to the permits and additional environmental review to go through the discretionary permit process and is speculative at this time. Furthermore, the conclusions throughout the EIR are supported by substantial evidence that no significant impacts would occur.
With respect to setbacks, the project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project's consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

With respect to the project's consistency with the neighborhood character, the recirculated EIR was updated (December 2013) to include information pertaining to the project's consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project's consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

BJ-15 Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people...
BJ-16 (cont.)

at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.
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<td>BJ-16 (cont.)</td>
<td>Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.</td>
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<td>In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.</td>
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<td>BJ-17</td>
<td>See response to comment BJ-15.</td>
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| **BJ-19** | With respect to proposed occupancy, see response to comment BJ-9.  
The project description accurately describes the events and programs that are proposed to occur at the facility. As stated in EIR Section 3.4.2.1, Shabbat services, concerts, high-holiday services, distinguished speaker events, and other large gatherings would continue to be held on campus in rented facilities.  
See also response to comment BJ-10. |
| **BJ-20** | The Phase 1/Phase 2 project would generate a total of eight peak hour trips. The City of San Diego does not require an analysis of roadways to which a project is forecasted to add less than 50 peak hour trips to roadways. Since the project will add much less than this amount to Glenbrook Way and to Cliffridge Drive, analyses of these roadways are not required.  
With respect to the stop sign, the Final EIR has been revised to remove the language discussing the installation of the stop sign. The installation of a stop sign at the corner of Caminito Deso and La Jolla Scenic Drive North is not part of the project. |
| **BJ-21** | With regards to attendance figures and facility occupancy, see the response to comment BJ-9. Based on the anticipated use of the facility, the traffic analysis is accurate. As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).  
With regards to attendance figures and facility occupancy, see the response to comment BJ-9. Based on the anticipated use of the facility, the traffic analysis is accurate. As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-
specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.
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<td>BJ-22</td>
<td>The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project. Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition. The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.</td>
</tr>
<tr>
<td>BJ-23</td>
<td>With regard to required parking, see response to comment BJ-16. With regard to anticipated use and occupancy, see responses to comments BJ-9 and BJ-10.</td>
</tr>
<tr>
<td>BJ-24</td>
<td>With respect to the significance associated with the loss of parking, the construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces. Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.</td>
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<td>BJ-24 (cont.)</td>
<td>With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.</td>
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<td>BJ-25</td>
<td>A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.</td>
</tr>
<tr>
<td>BJ-26</td>
<td>See the response to comment BJ-20.</td>
</tr>
<tr>
<td>BJ-27</td>
<td>Mitigation Measure BIO-1 was updated in the Final EIR to clarify that a pre-construction survey for active nests would be required within 300 feet of the proposed area of disturbance. As revised, Mitigation Measure BIO-1 would adequately reduce the impacts to nesting birds to less than significant.</td>
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<td>Implementation of Mitigation Measure BIO-1 would ensure that potential impacts to raptors would be less than significance because potential impacts to active nests would be avoided.</td>
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LETTER

Ms. Elizabeth Shearer-Nguyen
February 4, 2014
Page 7

Appendix C. There is no evidence to support the conclusion that these modifications to the bird
survey requirements will adequately mitigate impacts to raptors and breeding and nesting birds.

NOISE

The Noise analysis also fails to consider the impact of the whole project. The impact
analysis of project noise on adjacent sensitive receptors assumes a maximum of 50 attendees at
any one event. This is an artificial limit that is not reflective of the foreseeable use of the Student
Center. The Noise analysis must consider the maximum foreseeable use of the Student Center.
Analysis shows that 50 people can generate 45.4 dB(A) at 50% of the time. The Noise Ordinance limits sound
levels to 45 dB(A) for single-family residential uses within the interior areas during the evening hours. Based on Event
Logs, the Student Center’s current use can exceed 150 people at 9:00 p.m. on a Friday night.
Although the DEIR fails to consider the whole of the project as required by CEQA, the available
evidence in the DEIR indicates that the noise generated by the Student Center operating at full
capacity would likely exceed the limits established in the Noise Ordinance. Therefore the proposed
Student Center would have a significant noise impact.

VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

The DEIR fails to acknowledge the prominence of the project site and high visibility
from westbound La Jolla Village Drive, one of the primary entries into the community of La
Jolla. Although the initial discussion of site visibility acknowledges that tall trees and
landscaping screen views of the structures on the UCSD Campus, the next page of the DEIR
misleads the reader into believing the modern structures of the UCSD Theater District
characterize the area. The description of the theater district on page 4.12-2 fails to acknowledge
that the theater buildings are blocked from view by trees and landscaping.

On page 4.12-2, the DEIR describes the proposed Student Center as having a net 5,772
square feet, whereas in the Project Description the Student Center is described as having a gross

RESPONSE

BJ-28

With respect to noise, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m., and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. While additional visitors could be located within structures, the on-site noise sources anticipated from the project site would include activities at the courtyard and patios. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices within these exterior areas, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance levels for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.

With respect to the Existing with Improvements Alternative, Hillel would permanently use the existing Cliffridge. The Noise Report prepared for the project (EIR Appendix G) based the evaluation of this alternative on a maximum of 50 speaking voices. EIR Section 9.2.1 concludes that noise related to on-site uses for the Existing with Improvements Alternative would be consistent with existing measured noise levels, and therefore would not be significant when compared to existing and future traffic noise levels.

Sections 4.8.3.1 and 4.8.3.2 have been revised to include a brief discussion of potential noise impacts associated with anticipated special events at the Hillel facility that could attract more than the general daily average amount of visitors. It was determined that impacts would be less than significant.

BJ-29

With respect to the project’s consistency with the neighborhood character, see response to comment BJ-15.

Additionally, similar to the theater buildings on the UCSD Campus, the structures on the project site would be screened by landscaping.
BJ-29 (cont.)

An overview of the landscape plan is shown in EIR Figure 3-10 and its plant palette is provided in EIR Figure 3-11. As shown, approximately the project would provide nearly 20,000 square feet of landscaped area (exceeding the City’s regulation requiring 10,000 square feet of landscaping.

BJ-30
With respect to proposed setbacks, see response to comment BJ-15.

BJ-31
With respect to the square feet of the project, see response to comment BJ-9.

The project’s bulk and scale is consistent with the neighborhood character. See response to comment BJ-15. As detailed in EIR Section 4.12.4.1, the proposed on-site structures would range in size from 984 square feet to 3,298 square feet. The average size of the surrounding single-family homes is 2,335 square feet, with the largest of the surrounding homes, as indicated in Table 4.12-1, approaching 3,500 square feet. Therefore, the proposed structures would be comparable in size/bulk of those in the surrounding neighborhood. The project site also would be substantially screened from view. See response to comment BJ-29.
LETTER

Ms. Elizabeth Shemer-Nguyen
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The project site elevation is approximately 410 feet above mean sea level (AMSL), while the single-family homes to the south along Cliffridge are at approximately the same elevation. The single-family homes across La Jolla Scenic Way are at approximately 397 feet AMSL in elevation, or 10 feet below the project site. While the project site would be slightly higher in elevation, the site would be screened from view from surrounding residences by landscaping, in excess of City requirements, as illustrated on EIR Figure 3-10. Section 4.12.4.1a of the EIR addresses the visibility of the site.

See also responses to comments BJ-15 and BJ-31.

RESPONSE

BJ-32 With respect to precedent setting, Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.
substantially built out, precluding other student organizations with a religious affiliation from moving into this single-family residential neighborhood.

Hillel initiated purchase of property from the City of San Diego previously considered undevelopable by City staff. Hill, a religiously-affiliated student organization, has occupied a single-family residence since 2003. What’s to prevent other student organizations from similarly purchasing or occupying a single-family residence for the organizations? What’s to prevent an organization from purchasing several residences to convert to a religiously-affiliated student center? Hillel will set a precedent that other student organizations may follow. Therefore, approval of this Student Center will have a significant impact on Growth Inducement.

BJ-34 See response to comment BJ-28.

BJ-35 A description of the No Project Alternative has been revised to clarify that one of two possible outcomes could result under the no project scenario. If the code violation is resolved through the construction of required improvements, the impacts discussed under the Existing with Improvement Alternative would result. If the code violation is not resolved, the Cliffridge house would revert to single-family use as described in the revised portion of Final EIR Section 9.2.2.

BJ-36 The No Project Alternative is not the same as the Existing with Improvements Alternative. Under the No Project Alternative, no improvements would occur.

The EIR discloses the alternatives to the Phase 1/Phase 2 project in compliance with CEQA, including the Existing with Improvements Alternative. EIR Chapter 9, describes a reasonable range of alternatives in compliance with Section 15126.6(a) of the CEQA Guidelines.

BJ-37 Mitigation for impacts to raptors and/or any native/migratory birds is detailed in EIR Section 4.3.3.3. This mitigation is in conformance with the City of San Diego’s Land Development Code Biology Guidelines (2012). Implementation of Mitigation Measure BIO-1 would ensure that potential impacts to raptors would be less than significance. The mechanism to enforce the level of activity and attendance numbers is through the conditions of approval of the Site Development Permit. See responses to comments BJ-10 and BJ-19.
BJ-38 See response to comment BJ-20.

BJ-39 See response to comment BJ-27.

BJ-40 The whole of the project including physical and operational characteristics are described in detail in EIR Chapter 3. Any future expansion would require additional discretionary review and is speculative at this time. This comment does not raise any substantive issue relating to the adequacy or accuracy of the EIR. No further response is required.

Ms. Elizabeth Shearer-Nguyen
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Artificial limitations on the capacity of the proposed Student Center (although these limitations would be an illegal “piecemealing” of the project)
Flooding of Shabbat at a different location (also illegal “piecemealing” of the project)
Installation of a stop sign on Caminito Deseo

The Biological Resources Mitigation Measure does not reflect the language recommended by the project biologist as necessary to protect raptors and breeding and nesting birds. The biologist requires that if grading or brush management is proposed in or adjacent to native habitat during the bird breeding season, or an active nest is noted, the project biologist shall conduct a pre-grading survey for active nests in the development area and within 300 feet of it. The proposed mitigation measure requires a survey if removal of habitat must occur during the breeding season and fails to consider active nests adjacent to the area of disturbance. Similarly, the mitigation measure fails to require a survey of the area within 300 feet of the development area as recommended by the biologist in Appendix C. There is no evidence to support the conclusion that these modifications to the bird survey requirements will adequately mitigate impacts to raptors and breeding and nesting birds.

Conclusion

I continue to reserve my right to raise additional concerns as the environmental analysis on this project progresses. This DEIR fails to provide an accurate and suitable project description and fails to describe the whole of the project. The Project Description must be revised to consider the whole of the project in order for this DEIR to meet the requirements of CEQA. The DEIR must be recirculated when the whole of the project is described accurately and consistently in the document.

Thank you for the opportunity to comment on the DEIR. Please contact me if you have any questions or need additional information.

Very truly yours,

Julie M. Hamilton
Attorney for Taxpayers for Responsible Land Use
LETTER

February 4, 2014
TO: E. Shearer-Nguyen
   Environmental Planner
   City of San Diego Developmental Services Center
   1222 First Avenue, MS 501
   San Diego, CA 92101

RE: Project Name: UCSD Hillel Center for Jewish Life
   Project No. 212995/2010101030
   Community Plan Area: La Jolla
   Council District: 1

FROM: Oliver W. Jones, M.D.
   8635 Cliffridge Ave.
   La Jolla, CA 92037-2113

BK-1

The opportunity to respond to the most recent recirculated draft Environmental Impact Report (RDEIR) is appreciated. It is my understanding the deadline for submission of response from citizens was extended to February 11, 2014. On February 28, 2013, I submitted a response to the previous RDEIR. I shall endeavor to limit statements in this current response to perceived changes in the new RDEIR. I have an ongoing interest in response to statements offered in the 2013 letter thus enclosed with this new response, a copy of my letter from a year ago.

BK-2

To be candid, reviewing the new RDEIR was an onerous task. It was extremely difficult to determine specific changes in the document. The ‘Public notice of a recirculation’ did not include information of availability at various locations, in particular for La Jolla citizens, the local library on Draper Ave. I was able to find a copy of the RDEIR at the library but

RESPONSE

This comment is an introduction to comments that follow. No further response is required.

There is no requirement under the CEQA Guidelines to distribute copies of a public review EIR to local libraries; nevertheless, the City distributed the EIR to the La Jolla Branch Library as well as the downtown main library. The appendices were included as a CD provided within the hardcopy of the environmental document.

The City as Lead Agency followed all EIR noticing requirements under CEQA Guidelines Section 15087. The Notices of Availability of the EIR were widely distributed to agencies, organizations, and individuals who were known to have an interest in the project. In addition, the notice was published in the San Diego Daily Transcript. The notice included a website indicating where the EIR could be found.

In each version of the EIR, Section 1.3.1.1 stated the following:

The Draft EIR and all related technical studies are available for review during the public review period at the offices of the City of San Diego Development Services Department located on 1222 First Avenue, Fifth Floor, San Diego, California 92101. Copies of the Draft EIR are also available at the following public libraries:

- San Diego Public Library, Central Library
  820 E Street, San Diego, California 92101
- La Jolla Branch Library
  7555 Draper Avenue, San Diego, California 92037

This EIR is also available for review online at: http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html.

The City provided adequate notice of the EIR under CEQA.
The current recirculated EIR (December 2013) did not include red-lining or underlining. Furthermore, a strikeout/underline version was not an option available. The Preface to the recirculated EIR in both versions provided an accurate overview of the revisions made to each document.

The Hillel facility would be located within a convenient and walkable distance to activities in the southern portion of the UCSD campus and transit connections. This reasonable distance is approximately ¼ mile.

As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive.
to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.

BK-5 Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose "...is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
As detailed in EIR Section 3.0, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” The Hillel staff at the Cliffridge property support the religious programs for Hillel, including helping students plan programming for their religious life, developing religious events and trips, and fundraising for the students to do their religious work. As a primarily religious use, the Existing with Improvements Alternative would be allowed in the zone. See response to comment BK-5.

The City’s Code Enforcement Department issued a violation to the applicant under the 2001 Edition CBC Section 3405 stating: No change shall be made in the character of occupancies or use of any building which would place the building in a different division of the same group of occupancy or in a different group of occupancies, unless such building is made to comply with the requirements of this code for such division or group of occupancy.

The pending code violation therefore relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support that use. The issue is intended to be resolved in connection with approval of the proposed project. A Residential High Occupancy Permit is not required. This type of permit is required for a single dwelling unit with six or more persons 18 years of age and older residing for 30 or more consecutive days (see Section 123.0502 of the Municipal Code).

The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

With respect to the occupancy allowance at the facility, as stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have
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| BK-8 (cont.) between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.  

The project description is accurate; no future expansion of facilities is proposed at the site. Any future expansion would require additional discretionary review and is speculative at this time. Because this comments does not raise an issue relating to the content or adequacy of the EIR, no further response is required.  

As stated in EIR Section 3.4.2.1, Shabbat services, concerts, high-holiday services, distinguished speaker events, and other large gatherings would continue to be held on campus in rented facilities.  

At on-site special events, a Parking Management Plan would be implemented to assure that adequate parking would be available. |
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<th>LETTER</th>
<th>RESPONSE</th>
</tr>
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<tbody>
<tr>
<td><strong>BK-9</strong></td>
<td>With respect to the project's consistency with the neighborhood character, the recirculated EIR was updated (December 2013) to include information pertaining to the project's consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project's consistency with the neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant. EIR Chapter 3 accurately describes the proposed project's development summary, including the carport with solar panels. There are multiple figures in EIR Chapter 3 showing the proposed project's site plan and development features.</td>
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<tr>
<td><strong>BK-10</strong></td>
<td>The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project. Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.</td>
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<tr>
<td><strong>BK-11</strong></td>
<td>This RDEIR is incomplete, lacks objectivity and transparency. It reads much like a promotional treatise in support of a project that defies zoning rules and law in a residential neighborhood. There is no justification for Site 653 to be used in this fashion. I appreciate the opportunity to express my opinion.</td>
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Sincerely,

Oliver W. Jones, M.D.
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<th>LETTER</th>
<th>RESPONSE</th>
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|        | BK-10 (cont.)
|        | The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections. |
|        | BK-11    |
|        | The comment expresses the opinions of the commenter. It does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required. |
February 28, 2013

TO: E. Shearer-Nguyen
   Environmental Planner
   City of San Diego Developmental Services Center
   1222 First Avenue, M3 601
   San Diego, CA 92101

RE: Project Name: UCSD Hillel Center for Jewish Life
    Project No. 212995/2010101030
    Community Plan Area: La Jolla
    Council District 1

FROM: Oliver W. Jones, M.D.
   8635 Cliffridge Ave.
   La Jolla, CA 92037-2113

It is a privilege to respond to the recirculated draft Environmental Impact Report (DEIR). I have been able to obtain a copy of both the original DEIR and the recirculated draft for approximately $120.00. I received a written notice of document availability along with a deadline for receipt of written comments. The notification described the City of San Diego website where the DEIR could be reviewed but I did not receive information that the DEIR would be available for review at the downtown central library and the La Jolla community library. Others have had difficulty locating a source for review of this document. Most citizens would not be aware the DEIR was available for review at both the downtown and La Jolla libraries.

BL-1 The City as Lead Agency followed all EIR noticing requirements under CEQA (Section 15087 of the CEQA Guidelines). The Notices of Availability of the Draft EIR were widely distributed to agencies, organizations, and individuals who were known to have an interest in the project. In addition, the notice was published in the San Diego Daily Transcript. The notices included a website indicating where the Draft EIR could be found.

In each version of the EIR, Section 1.3.1.1 stated the following:

The Draft EIR and all related technical studies are available for review during the public review period at the offices of the City of San Diego Development Services Department located on 1222 First Avenue, Fifth Floor, San Diego, California 92101. Copies of the Draft EIR are also available at the following public libraries:

- San Diego Public Library, Central Library, 820 E Street, San Diego, California 92101
- La Jolla Branch Library, 7555 Draper Avenue, San Diego, California 92037

This EIR is also available for review online at: http://clerkdoc.sannet.gov/Website/publicnotice/pubnoticeqa.html.

The City provided adequate notice of the EIR under CEQA.
Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “. . . is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

The EIR discusses all potentially significant impacts associated with project implementation.
With respect to the current use of the Cliffridge property, neither the Phase 1/Phase 2 project nor the Existing with Improvements Alternative is an office building, nor are they considered office uses. As discussed in Chapter 3, Project Description, the project entails a facility that would be used primarily for religious purposes, with space for religious learning, community-building, and spiritual counseling. This is an allowable use in the Single Family Zone.

As detailed in Section 3.0 of the EIR, the Cliffridge property is currently used to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD in accordance with the Hillel Articles of Incorporation (see response to Comment K-24). The Hillel staff at the Cliffridge property support the religious programs for the organization. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the City Municipal Code. The comment correctly states that a deviation would be required for the additional six parking spaces; however, a deviation is not required for a reduction in landscape/increase in hardscape. The FEIR has been revised to remove reference to this deviation.

As discussed in EIR Section 4.1.3.1(a), during Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut, instead of a 24-foot-wide curb cut for the Phase 1 site. The temporary parking area would provide parking for Hillel staff members during Phase 1. The proposed deviation would not result in secondary environmental effects. A Residential High Occupancy Permit is not required for either the Phase 1/Phase 2 project or the Existing with Improvements Alternative, as neither involve a residential component. This type of permit is required for a single dwelling unit with six or more persons 18 years of age and older residing for 30 or more consecutive days (see Section 123.0502 of the Municipal Code).

As an alternative to the proposed Phase 1/Phase 2 project, the Existing with Improvements Alternative is analyzed in Chapter 9.0 of the FEIR. Pursuant to CEQA the decision makers would be able to select an alternative in lieu of the proposed project.
With regards to precedent setting, Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.
As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumption for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.

As detailed in Section 3.1 of the DEIR, one of the project objectives is to “contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (¼ mile) distance to activities in the southern portion of the UCSD campus and transit connections.” The Phase 1/Phase 2 project
close proximity to activities on campus. However, as detailed in Section 9.1 of the EIR, alternative locations were analyzed on more than just the south side of the UCSD campus.

CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project
site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.

The EIR did not identify any significant impacts with regards to Land Use (Section 4.1), Transportation, Circulation, Parking (Section 4.2), or Visual Effects and Neighborhood Character (Section 4.12) for the reasons detailed within each section. The EIR did conclude that there would be significant impacts associated with biological resources, noise, and paleontological resources. Therefore, the focus of the alternative selection was to reduce those impacts. The EIR is not required to address the effects of each of the considered alternatives for all topics, including land use, traffic, and visual/neighborhood character.

The Existing with Improvements Alternative is evaluated within the alternatives chapter of the FEIR. The alternatives identified in Chapter 9 are intended to avoid or substantially lessen significant effects of the project. The EIR addresses alternatives considered but rejected, as well as the No Project Alternative, the Reduced Project Alternative, and an alternate location known as the Site 675 Alternative. The Site 675 Alternative was determined to be a possible site for the Phase 1/Phase 2 project, and is analyzed in Section 9.2.4 of the EIR. Pursuant to CEQA, the decision makers would be able to select an alternative in lieu of the proposed project.

As detailed in Section 9.1 of the EIR, several alternate location options were analyzed for feasibility by MarketPoint when the Notice of Preparation was issued (2010), which in turn constitutes the baseline conditions for the project and alternatives analysis. The alternative site research included vacant lots, leasable facilities, flex space for sale, and shared space within a reasonable walking distance of the UCSD campus or along a UCSD bus line that encircles the university. Three potential locations were examined in this analysis.

The first site is at the corner of Genesee and La Jolla Village Drive. This is a vacant multi-acre site owned by Garden Communities. It is planned for four high-rise residential towers. The owners of the site intend to build on it when the economy improves and therefore it is
not for sale. There are two other vacant sites, both at Judicial Drive and Executive Drive to the east of Genesee Avenue. One site is being planned for a high-rise hotel or combination condominium/hotel and the other is designated scientific/research. Neither of the sites is appropriate for a Hillel facility because the sites are far too large and are too distant from campus to meet the objectives of the project.

Development on these alternative vacant sites would not reduce the significant and mitigable impacts of the Phase 1/Phase 2 project, nor would these sites meet a majority of the project objectives.

The EIR identified significant (mitigated) impacts associated with biological resources, noise, and paleontological impacts. As detailed in Section 9.2.3 of the EIR, the intention of the Reduced Project Footprint on VacantParcel Alternative is to decrease the development footprint on the vacant parcel in order to reduce significant biological, noise, and paleontological impacts associated with the Phase 1/Phase 2 project.

The alternative was updated in the Recirculated EIR (December 2013) to be titled “Reduced Project Footprint on Vacant Parcel Alternative” in order to reflect that the intention of the alternative was to reduce potential impacts associated with the Phase 1/Phase 2 project. This alternative reduced the development footprint by removing one building, and reducing another to be one story instead of two. The intention of this alternative was to reduce grading, and thus reduce potential impacts associated with paleontological resources, and also to reduce the perceived visual impacts identified by those who commented on the NOP.

The Recirculated EIR (December 2013) contains a map with the location of the Site 675 Alternative within Chapter 9, Alternatives (see Figure 9-1).
LETTER

residence thus the Reduced Project results in a larger student center than the primary proposed project (Phase 1/Phase 2).

The RDEIR does not provide a map to define the location of Site 675. On the other hand, the description within the RDEIR describes Site 675 as unrealistic. Based on information provided under Project Alternatives, there appears to have been no serious effort made to identify alternatives away from the site (formerly 663) in the project proposal and within a similar walking distance (0.8-1.9 miles) for students who will face this walking distance if the Hillel Student Center project is approved as presented.

3.0 Project Description

The RDEIR is reviewed for accuracy, completeness, consistency and transparency. There are flaws and certainly disagreements. For example, in the section on "Raptors" a lack of transparency is present. Raptors were using trees on Site 663 as nesting sites until the City had virtually all on the site removed a few years ago. This is not mentioned. Red-tail and Cooper's hawks are still seen on the light standards at the edges of the site, but of course the nesting spots are gone hence little if any impact in the EIR.

The EIR must include consideration of the whole project as an impact including future impacting activities if the project is approved. This includes other religious affiliated organizations acquiring single-family residences and illegally using them for offices as Hillel has done for the past 8-9 years.

3.1 Project Objectives

The project Description and Objectives fails to acknowledge the project is a Student Center serving students at UCSD. This lack is in direct contrast to the Hillel mission statement and goals noted on pages 2 and 3 of this response. The only space described for possible religious use is the Chapel/Library, just 16% of the total Hillel Student Center cluster of buildings. Further, it is my understanding that Shabbat services will not be offered at the student center. A 400 sq.ft. kitchen including

RESPONSE

BL-7 As required under CEQA Guidelines Section 15125(a):

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published.

The NOP was published on October 8, 2010. Therefore, the baseline conditions are adequately described, and conditions prior to that date (i.e., in the year 2000) are not applicable according to CEQA. The history of the project is summarized in Section 3.6 of the EIR.

Therefore, the baseline conditions are adequately described, and conditions prior to that date are not applicable according to CEQA. The history of the project is summarized in Section 3.6 of the EIR.

Further, implementation and subsequent adherence to MM-BIO-1 would ensure that potential impacts to raptors would be less than significant.

See also response to comment BL-4.

BL-8 See response to comment BL-4.
### LETTER

an eight-burner top, men’s and women’s lavatory/showers, all emphasize the social/cultural nature of the proposed project. Please explain how this does not confirm that the project will NOT be used primarily for religious purposes. In this light, a university-affiliated student center is not allowed in a single-family residential zone according to the LJSPDO. Hillel’s conversion of a single-family home into administrative office space also is illegal within the LJSPDO. Please help me understand what religious services occur presently in the home at 8976 Cliffridge Ave. As noted in a previous section, at least two of UCSD colleges, offer extensive course curriculum for study in Hebrew and Judaism.

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<tr>
<th>BL-9</th>
<th>Purpose and Activities Overview</th>
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<tr>
<td></td>
<td>This section serves to emphasize the proposed student center will not be used primarily for religious purposes, rather cultural and social responsibilities.</td>
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<th>BL-10</th>
<th>Phase 1/Phase 2 and SDP</th>
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<td></td>
<td>There is no mention of the La Jolla Shores Design Manual, a requirement for consideration of a Site Development Permit (SDP) under the LJSPDO. Moreover, an applicant may not pick and choose which aspects of the Design Manual they wish to apply—the entire manual must be applied. “Unity with variety” is the guideline and Hillel is proposing a student center in a single-family residential neighborhood on a previously undevelopable plot of land. This is direct conflict with the Design Manual. The proposed student center will have a gross floor area of more than 7,000 feet consisting of 3 buildings clustered within an approximate center of the site. The roof, at its highest point will soar to a height of 50 feet. The center presents a wall of building some 148 ft. long, set back some 10 feet from the property line and directly across the street from several single-family homes. There are no homes in this area that come close to this scale, most homes are 3000 to 3000 sq. ft. The bulk and scale of the proposed student center overwhelms neighborhood homes. Unity of structure in this neighborhood is completely disrupted. Please provide comments on any setback study for buildings in the proposed project. It appears having the student</td>
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### RESPONSE

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<th>BL-9</th>
<th>See response to comment BL-2.</th>
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<td>BL-10</td>
<td>The project is analyzed in relation to all relevant LJSPD ordinance design regulations, including the La Jolla Shores Design Manual. See EIR Sections 4.1 and 4.12.</td>
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As analyzed in EIR Section 4.1.4.1(a), the project would conform to these concepts of scale, environmental quality, preservation of character, harmony, originality and diversity, color, roof materials, and exterior wall materials. The recirculated EIR was updated (December 2013) to include information pertaining to the project's consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project's consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

The specific details of the project's proposed design is discussed in EIR Section 3.4.1.1. As stated therein, the project would consist of the construction of three individual structures with a gross floor area of 6,479 square feet, situated around a central outdoor courtyard. Additionally, building heights would range from 18 to 28 feet.
center 10 feet off the property line for some 148 ft. along La Jolla Scenic Drive N. is lack of consistency with setbacks for homes within the La Jolla Highlands neighborhood.

3.3.1.3 Street Right of Way Vacation

There is a lack of transparency as to the purpose of the Right of Way vacation. It is not, as stated in the RDRIR, “to enhance the pedestrian environment through construction of sidewalks and landscaping features”, it is rather because without a street vacation as proposed, it is unlikely the student center could be built on its proposed site. The RDRIR should not present such obviously misleading and incorrect statements such as this. Moreover, there is no description of what impact street vacation would have on traffic flow/parking along La Jolla Scenic Drive N.

I know City staff is well aware of findings for public right-of-way vacation approval, but I feel compelled to restate here.

“A public right-of-way may be vacated only if the decision maker makes the following findings:

(a) There is no present of prospective public use for the public right-of-way
(b) The public will benefit from the action through improved use of land made available by the vacation
(c) The vacation does not adversely affect any applicable land use plan or; and
(d) The public facility for which the public right-of-way was originally acquired will not be detrimentally affected by the vacation”

All four findings must be met in order to approve a street vacation for a public right of way. The Hillside project does not meet any of these findings. A street right-of-way vacation on La Jolla Scenic Drive N. would eliminate 6 on-street parking spaces on the cul-de-sac. This loss is in addition to 7 other lost parking sites due to the student center project seeking curb cut and entrance to the center parking area from La Jolla Scenic Way.

With respect to setbacks, the project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

The ROW vacation is proposed in order to provide 10,000 square feet of open space on the project site. As detailed in EIR Section 3.4.2.1(f): the northwestern portion of the site where the existing cul-de-sac is located would be landscaped to create a park-like amenity including a bike path from La Jolla Scenic Drive North to Torrey Pines Road/La Jolla Village Drive. The ROW vacation is a component of the Phase 1/Phase 2 project, which would be required to meet several development requirements while also providing the aforementioned enhanced pedestrian environment.

With regards to traffic safety associated with the ROW vacation, EIR Section 4.2.5.1(a) states the following:

Phase 1/Phase 2 would abandon the westerly cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. However, the vacation of the street right-of-way and street reconfiguration combined with additional sidewalks in this area would actually improve pedestrian and bicycle routes and would not pose a hazard to vehicles.

Findings associated with the ROW vacation would be required. The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.
With respect to loss of on street parking spaces, the construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.
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<td><strong>BL-12</strong></td>
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<td>A street right-of-way vacation as proposed would narrow the street landscape on the 6800 block of La Jolla Scenic Dr. N. from 36 ft. wide to 34 ft. wide. Cars parked on both sides of this street already constitute a vehicular and pedestrian hazard. This would be accentuated with narrowing of the street. A stop sign at the intersection of Cliffridge Ave. and La Jolla Scenic Dr. N. is scarcely noticed by cars turning on to La Jolla Scenic Dr. N. This too increases the risk factor for collisions if the street is narrowed.</td>
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<td><strong>BL-13</strong></td>
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<td>The San Diego City Planning Commission voted to deny the proposed street vacation in 2008 and again in 2008. There is no public benefit and significant public loss (parking) resulting from the proposed street vacation.</td>
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<td><strong>BL-12</strong></td>
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<td>The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City's Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.</td>
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<td><strong>BL-13</strong></td>
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<td>The Phase 1/Phase 2 project would generate a total of eight peak hour trips. The City of San Diego does not require an analysis of roadways to which a project is forecasted to add less than 50 peak hour trips. Since the project would add less than this amount to Cliffridge Avenue and Glenbrook Way, an analysis of this roadway is not warranted.</td>
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</table>

No such agreement relating to on-campus parking exists at this time. At special events, a Parking Management Plan would be implemented to assure that adequate parking would be available.

With respect to the Venter project as a cumulative project, the Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.
A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

As discussed in EIR Section 4.1.3.1(a), during Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut, instead of a 24-foot-wide curb cut for the Phase 1 site. The temporary parking area would provide parking for Hillel staff members during Phase 1. The proposed deviation would not result in a violation nor result in secondary environmental effects.

Additionally, there is no known requirement for “mitigation of development along Gilman Drive.”

As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year.
occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

With respect to project trips, as detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California. Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.

With respect to loss of parking, see response to comment BL-11. Hillel would have in place an approved Parking Demand Management Plan as a condition of approval for its larger events.
With respect to noise, project-related noise impacts are analyzed in EIR Section 4.8. Specifically, the EIR discusses whether the potential for on-site noise generation would exceed allowable limits. As shown in Table 4.8-1, the City Noise Ordinance limits one hour average sound levels within single-family residential uses to a maximum of 50 dB(A) from the hours of 7:00 a.m. to 7:00 p.m., and 45 dB(A) from the hours of 7:00 p.m. to 10:00 p.m. On-site noise sources anticipated from the project site would include activities at the courtyard and patios, which would typically consist of conversations, meetings, and general social gatherings. While additional visitors could be located within structures, the on-site noise sources anticipated from the project site would include activities at the courtyard and patios. Section 4.8.3.1(a) of the EIR explains that based on a maximum of 50 speaking voices within these exterior areas, noise levels would be 43.4 dB(A) at the closest adjacent residential receiver. This is less than the daytime and evening noise ordinance limits for single-family residential uses. With respect to potential noise impacts from HVAC units, the EIR concludes that HVAC noise levels are not projected to exceed 40 dB(A) at the adjacent residential properties, also below the allowable noise ordinance levels.

With respect to the Existing with Improvements Alternative, Hillel would permanently use the existing Cliffridge. The Noise Report prepared for the project (EIR Appendix G) based the evaluation of this alternative on a maximum of 50 speaking voices. EIR Section 9.2.1 concludes that noise related to on-site uses for the Existing with Improvements Alternative would be consistent with existing measured noise levels, and therefore would not be significant when compared to existing and future traffic noise levels.

Sections 4.8.3.1 and 4.8.3.2 have been revised to include a brief discussion of potential noise impacts associated with anticipated special events at the Hillel facility that could attract more than the general daily average amount of visitors. It was determined that impacts would be less than significant.
Potential visual impacts under the Phase 1/Phase 2 project are adequately analyzed in Section 4.12 of the EIR (Visual Effects and Neighborhood Character). The elevations of each building associated with the Phase 1/Phase 2 project are shown in Figures 3-12a and b. Phase 2 building heights would range from 18 to 28 feet, and would be consistent with the LDC, Coastal Height Overlay Zone, and the Design Manual by not exceeding 30 feet.

As detailed within Section 4.12.4.1(a), the site is visible from La Jolla Village Drive, a Primary Arterial roadway where 44,790 vehicles travel per day. Phase 1/Phase 2 was designed to “fit in” with the surrounding development and natural topography through considerations of height, bulk, signage, or architectural projections.

Future applicants are beyond the scope of the CEQA analysis at this time and would be examined on a case-by-case basis.

The EIR provides an analysis of the project’s consistency with all relevant policies, plans, and ordinances. Specifically, Section 4.1 of the EIR includes a land use compatibility discussion focusing on the following: City’s General and La Jolla Community Plans, Land Development Code Regulations (including the Coastal Overlay Zone), La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual. As discussed therein, implementation of the Phase 1/Phase 2 or the Existing with Improvements Alternative would comply with all land use designations, goals, and policies, as well as all applicable development regulations. No direct or secondary effects would result and impacts were determined to be less than significant.

Additionally, Section 4.12 of the EIR provides an analysis of the project’s development features as they relate to City codes. Specifically, Section 4.12.3.1 details the project’s consistency with design guidelines related to organized appearance, bulk and scale, walls, and varied visual environment. Overall, it is determined that implementation of the Phase 1/Phase 2 or the Existing with Improvements Alternative would not result in a disorganized appearance inconsistent with relevant City codes, would not exceed height, bulk, or coverage regulations, would not construct walls in excess of height or length maximums, and would not create a monotonous visual environment. Visual impacts would therefore be less than significant.
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<tr>
<th>LETTER</th>
<th>RESPONSE</th>
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<tbody>
<tr>
<td>BL-20</td>
<td>The EIR provides the details necessary to allow a finding that the project is a permanent space to be used primarily for religious activities, specifically to facilitate religious, spiritual, and intellectual growth. See response to comment BL-2 for a discussion of the allowance of this use within this location.</td>
</tr>
<tr>
<td>BL-21</td>
<td>With respect to the current use of the Cliffridge property, neither the Phase 1/Phase 2 project nor the Existing with Improvements Alternative is an office building, nor are they considered office uses. As discussed in Chapter 3, Project Description, the project entails a facility that would be used primarily for religious purposes, with space for religious learning, community-building, and spiritual counseling. This is an allowable use in the Single Family Zone. As detailed in Section 3.0 of the EIR, the Cliffridge property is currently used to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD in accordance with the Hillel Articles of. The Hillel staff at the Cliffridge property support the religious programs for the organization. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the City Municipal Code. The comment correctly states that a deviation would be required for the additional six parking spaces; however, a deviation is not required for a reduction in landscape/increase in hardscape. The FEIR has been revised to remove reference to this deviation.</td>
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<td>Letter</td>
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<td><strong>BL-22</strong></td>
<td>The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.</td>
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<tr>
<td><strong>BL-23</strong></td>
<td>With respect to the traffic analysis of Glenbrook and Cliffridge, the Phase 1/Phase 2 project would generate a total of eight peak hour trips. The City of San Diego does not require an analysis of roadways to which a project is forecasted to add less than 50 peak hour trips. Since the project would add less than this amount to Cliffridge Avenue and Glenbrook Way, an analysis of this roadway is not warranted. With respect to the safety of U-turns, EIR Section 4.2.5.1(a) states the following: Outbound traffic oriented to La Jolla Village Drive would make a southbound to northbound U-turn at the intersection of La Jolla Scenic Drive North and Caminito Deseo. A field observation of the available turning radius at Caminito Deseo was compared to the required minimum design internal turning radius of 36 feet. Based on the field visit under existing roadway conditions, it was observed that 40 feet of internal turning radius is available. Therefore, a U-turn is feasible at this intersection. Although a U-turn is feasible, additional traffic measures would be required to prevent potential conflict between U-turning vehicles and vehicles making a westbound to northbound right turn from Caminito Deseo onto La Jolla Scenic Drive. The traffic study recommends the installation of a stop sign on Caminito Deseo approaching La Jolla Scenic Drive. Therefore, potential traffic safety concerns noted by the commenter related to U-turns were found to be less than significant, as detailed in EIR Section 4.2. A maximum of seven vehicles are expected to perform the U-turn during the PM peak hour.</td>
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<tr>
<td><strong>BL-24</strong></td>
<td>With respect to occupancy issues, the Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein,</td>
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I appreciate the opportunity to respond to this RDEIR.

Sincerely,

Oliver W. Jones, M.D.
it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

With respect to the adequacy of parking, Hillel would have in place an approved Parking Demand Management Plan as a condition of approval for its larger events.

The Phase 1/Phase 2 project is analyzed in relation to applicable LJSPD ordinance design regulations, including the La Jolla Shores Design Manual, within Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character). As analyzed in Section 4.1.4.1(a) the proposed HCJL under Phase 1/Phase 2 would conform to these concepts of scale, environmental quality, preservation of character, harmony, originality and diversity, color, roof materials, and exterior wall materials.

The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to
other neighboring building setbacks (see response to comment K-13).

With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:
The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.

The EIR did not identify any significant impacts with regards to Land Use (Section 4.1), Transportation, Circulation, Parking (Section 4.2), or Visual Effects and Neighborhood Character (Section 4.12) for the reasons detailed within each section. The EIR did conclude that there would be significant impacts associated with biological resources, noise, and paleontological resources. Therefore, the focus of the alternative selection was to reduce those impacts. The EIR is not required to address the effects of each of the considered alternatives for all topics, including land use, traffic, and visual/neighborhood character.

The Existing with Improvements Alternative is evaluated within the alternatives chapter of the FEIR. The alternatives identified in Chapter 9 are intended to avoid or substantially lessen significant effects of the project. The EIR addresses alternatives considered but rejected, as well as the No Project Alternative, the Reduced Project Alternative, and an alternate location known as the Site 675 Alternative. The Site 675 Alternative was determined to be a possible site for the Phase 1/Phase 2 project, and is analyzed in Section 9.2.4 of the EIR. Pursuant to CEQA the decision makers
As detailed in Section 9.1 of the EIR, several alternate location options were analyzed for feasibility by MarketPoint when the Notice of Preparation was issued (2010), which in turn constitutes the baseline conditions for the project and alternatives analysis. The alternative site research included vacant lots, leasable facilities, flex space for sale, and shared space within a reasonable walking distance of the UCSD campus or along a UCSD bus line that encircles the university. Three potential locations were examined in this analysis.

The first site is at the corner of Genesee and La Jolla Village Drive. This is a vacant multi-acre site owned by Garden Communities. It is planned for four high-rise residential towers. The owners of the site intend to build on it when the economy improves and therefore it is not for sale. There are two other vacant sites, both at Judicial Drive and Executive Drive to the east of Genesee Avenue. One site is being planned for a high-rise hotel or combination condominium/hotel and the other is designated scientific/research. Neither of the sites is appropriate for a Hillel facility because the sites are far too large and are too distant from campus to meet the objectives of the project.

Development on these alternative vacant sites would not reduce the significant and mitigable impacts of the Phase 1/Phase 2 project, nor would these sites meet a majority of the project objectives.

The EIR identified significant (mitigated) impacts associated with biological resources, noise, and paleontological impacts. As detailed in Section 9.2.3 of the EIR, the intention of the Reduced Project Footprint on Vacant Parcel Alternative is to decrease the development footprint on the vacant parcel in order to reduce significant biological, noise, and paleontological impacts associated with the Phase 1/Phase 2 project.

The alternative was updated in the Recirculated EIR (December 2013) to be titled “Reduced Project Footprint on Vacant Parcel Alternative” in order to reflect that the intention of the alternative was to reduce potential impacts associated with the Phase 1/Phase 2 project. This alternative reduced the development footprint by removing one building, and reducing another to be one story instead of two. The intention of this alternative was to reduce grading, and thus reduce potential impacts associated with paleontological
Although this alternative reduces the footprint, it would still involve some level of grading to provide landscaping where the building was located. While no site plan is provided, the analysis is based on description provided in Section 9.2.3 of the EIR.

The development footprint for construction would be reduced, although not to 1.34 acres. That number represents the total site of this alternative (i.e., the two new buildings and the use of the Cliffridge property). Ultimately, Chapter 9 of the EIR determined that impacts associated with this alternative would be slightly reduced with regards to visual impacts, and that biological and paleontological impacts would be similar to the proposed project.
LETTER

January 22, 2014

Ms. E. Shearer-Nguyen
Environmental Planner
City of San Diego Development Services Center
1222 First Avenue, MS501
San Diego, CA 92101

USDEAS@sandiego.gov

Subject: UCSD Hillel Center for Jewish Life, Project No. 212995 (hereafter: “Student Center”)

Dear Ms. Shearer-Nguyen,

I am writing to let you know of a serious omission in the DEIR associated with the UCSD Hillel Center for Jewish Life’s proposal of the Student Center on the corner of La Jolla Village Drive and Torrey Pines Road.

The DEIR omits the analysis as to whether the right of way vacation on the 8900 block of La Jolla Scenic Drive is lawful. The street vacation is required for their proposed student center.

The requirements for a right of way vacation are:

1. There is no present or prospective public use for the public right-of-way, either for the facility which it was originally acquired or for any other public use of a like nature that can be anticipated;
2. The public will benefit from the action through improved use of the land made available by the vacation;
3. The vacation does not adversely affect any applicable land use plan; and
4. The public facility for which the public right-of-way was originally acquired will not be detrimentally affected by the vacation.

All four of the findings must be fulfilled. A complete analysis of the proposed Student Center project will demonstrate that none of the findings can validly be made.

The current block of 8900 is used for public parking in a parking overlay zone. It also serves as a turn-around point at the cul-de-sac end of the road when scores of students travel the road in search of much needed parking. Public service vehicles have been seen to be parked in the area as the police and other public service entities use the area as a parking area to pay attention to traffic, patrol, and pedestrian monitoring. Further, the block is only wide enough now for the multitude of cars, pedestrians, bicyclists, and other.

RESPONSE

BM-1

The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

BM-2

With respect to loss of on-street parking, the construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces.

Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.

With respect to the safety of cul-de-sac, as detailed in DEIR Section 4.2.5.1(a), vehicles may currently use the La Jolla Scenic Drive North cul-de-sac as a turnaround area. As shown in Figure 4.2-2 during the AM peak hour (highest hour between 7-9 a.m.), no vehicles turned into the cul-de-sac from La Jolla Scenic Drive North, and only two vehicles turned into the cul-de-sac from Cliffridge Avenue. Only seven vehicles turned into the cul-de-sac during the PM peak hour (highest hour between 4-6 p.m.).

Phase 1/Phase 2 would vacate the westerly cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. The vacation of the street right-of-way and street reconfiguration will provide pedestrian improvements at this location.

With respect to reducing the street width La Jolla Scenic Drive North The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a
BM-2 (cont.)
curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

See also response to comment AE-1.
<table>
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<tr>
<th>BM-3</th>
<th>See response to comment BM1.</th>
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<tbody>
<tr>
<td>BM-4</td>
<td>The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.</td>
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<tr>
<td>BM-5</td>
<td>With respect to the reduction in on-street parking, The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces. Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.</td>
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<tr>
<td>BM-6</td>
<td>With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.</td>
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The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council. This comment is a conclusion to the comments that were responded to above. No further response is required.
BN-1

Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.
BN-2

The DEIR states:

"While there is a potential for other UCSD student religious organizations to seek off campus facilities in the project area, the constraints of finding a suitable site would be a limiting factor. The area in which the project is proposed is mostly developed, with UCSD and Scripps in close proximity to the project site as well as existing residential uses. Although there are small pockets of undeveloped land nearby, future development in this area is largely constrained by existing development, allowed uses, permitting and environmental review requirements, and the cost of acquiring land. Therefore, development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively."

In other words: precedent is set.

Money would be the only thing that could stop an interested organization from moving into the neighborhood and further encroaching on the single family residential neighborhood. We know the possibility of a powerful and bullying organization to push its way into such a neighborhood would increase with the development of this center, a Student Center that has no rights to be developed on the proposed site, when analyzing land use as defined by the City of San Diego for said location.

It is monumentally irresponsible and against the letter of the San Diego land use codes to allow the development of this land for the use of a Hillel student center.

Thank you for your consideration,

Steve Kuster

Steve Kuster ID

BN-2

See response to comment BN-1.
As discussed in EIR Section 3.6.1, the project site was evaluated for potential incorporation into the City’s Park and Recreation Department’s open space inventory in November 2000. As detailed in a City memo from the Director of the Park and Recreation Department (McLatchy 2000), the parcel did not meet the City’s definition as an open space parcel, as it is “completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value.

The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

With respect to the reduction in on-street parking, The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces. Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.

With regard to the project’s contribution to traffic and traffic safety, EIR Section 4.2 analyzed potential traffic hazards concluding that impacts would be less than significant.
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<td>BO-2</td>
<td>As discussed in EIR Section 4.2.5.1(a) pedestrian access to the project would be via a non-contiguous sidewalk encompassing the facility with the primary walkway into the facility being located off La Jolla Village Drive. This location was chosen to provide a safer route into the center than through the driveway where cars will be maneuvering in and out, and since the crosswalks from the UCSD campus along La Jolla Village Drive are located on both ends of the walkway. A new pedestrian curb ramp would be constructed on Cliffridge Avenue towards the front of the Cliffridge property. This improvement would ensure that traffic hazards to motor vehicles, pedestrians, and bicycles would be less than significant.</td>
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<tr>
<td>BO-3</td>
<td>This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.</td>
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<tr>
<td>BO-4</td>
<td>The Venter Institute project referred to in this comment was added to the cumulative projects within the recirculated EIR (December 2013). See EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project. Traffic impacts were evaluated in EIR Section 4.2. No significant impacts would occur as a result of the project. With respect to open space, see response to comment BO-1.</td>
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</table>
BP-1 This comment is an introduction to comments that follow. No further response is required.

BP-2 This comment does not raise any substantive issue relating to the adequacy or accuracy of the EIR. No further response is required.

BP-3 The previous recirculated EIR (January 2013) did not include redlining or underlining, nor did the current recirculated EIR (December 2013). The Preface to the recirculated EIR in both versions provided an overview of the revisions made to each document.

The Preface states:

Section 15088.5(g) of the CEQA Guidelines requires a summary of the revisions made to the previously circulated Draft EIR. The following is a summary of the environmental analysis revisions completed.

Planned development projects within the vicinity of the project site have been added to Chapter 7, Cumulative Impacts. The traffic impact analysis and other environmental issues have been revised as applicable. Additional information includes a construction traffic analysis, an updated biological survey, an updated analysis on the potential for on-site generated noise, and further clarification of the Phase 1/Phase 2 project (such as the size of the street vacation, street dedication, easements, and lot coverage).

Therefore, the recirculated EIR complied with the requirements under CEQA with regards to the recirculation of the EIR. There was no intention to confuse or to discourage readers from making cogent comments on the adequacy of the EIR, as is demonstrated by the inclusion of the Preface.

BP-4 See response to comment BP-3.

Pursuant to CEQA Guidelines Section 15088.5, recirculation of an EIR is required prior to certification when significant new information is added to the EIR after public notice is given of the availability of draft EIR for public review under Section 15087 but before certification. The term “information” can include changes in the project or environmental setting as well as additional data or other information.
The remainder of the comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

BP-5

The project name was changed to clarify the project as permanent facility used primarily for religious purposes.

BP-6

Citywide open code violations are not relevant to the project. The code violation associated with the Cliffridge property would be resolved upon approval of the proposed project.

Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples, and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.
The Reduced Project Footprint on Vacant Parcel Alternative is detailed in EIR Section 9.2.3. The intention of this alternative is to decrease the development footprint on the vacant parcel in order to reduce significant biological, noise, and paleontological impacts compared with the Phase 1/Phase 2 project.

The EIR contained a typographical error, as the project footprint would not be 1.34 acres. The new development footprint would be reduced by constructing two new structures, instead of three, and compared to the Phase 1/Phase 2 project, there would be a reduction of 380 square feet of gross floor area.
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<td><strong>BP-8</strong></td>
<td>This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.</td>
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<td><strong>BP-8</strong></td>
<td>The Cliffridge property is currently a single-family residence being used primarily for religious purposes, and is not an &quot;office use&quot; as the commenter uses the term.</td>
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<td><strong>BP-10</strong></td>
<td>The proposed project would consist of the construction of three individual structures with a gross floor area (GFA) of 6,479 square feet, situated around a central outdoor courtyard. For a detailed history of the project, see EIR Section 3.6.</td>
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<td><strong>BP-11</strong></td>
<td>Site 675 is addressed in the EIR as an alternative site for the project. As detailed in EIR Chapter 9, this alternative would not reduce any of the significant and mitigable impacts associated with the proposed project. As further shown in Table 9-1, the Site 675 Alternative would result in greater impacts than the project relative to biological resources, greenhouse gas emissions/global climate change, and hydrology. Furthermore, the site has a heavily sloping topography and access constraints. Note that Site 675 is not on the UCSD campus. With respect to the project site as open space, EIR Section 3.6.1 explains that the project site had been evaluated for potential incorporation into the City's Park and Recreation Department's open space inventory in November 2000. As detailed in a City memo from the Director of the Park and Recreation Department (McLatchy 2000), the parcel did not meet the City's definition as an open space parcel, as it is &quot;completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value.&quot;</td>
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<td><strong>BP-12</strong></td>
<td>The project includes an array of religious activities as detailed in EIR Section 3.4.2.1(a). A number of off-site locations were evaluated in EIR Sections 9.1 and 9.2.4 of the EIR. None of the alternative off-site locations fully met the project objectives while reducing impacts identified in the EIR.</td>
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<td><strong>BP-13</strong></td>
<td>Why are the HCLJ services different from the religious support provided by the various religious organizations on campus? There is no evidence in this document (or at any of the hearings since 2000 that I have viewed/attended) to indicate that any services the HCLJ wishes to provide are not already provided through the UCSD affiliated groups, or the several Jewish faith temples/synagogues/Chabad, etc., in the Golden Triangle, especially in the area of University City, adjacent to UCSD, designated as the urban node for UCSD affiliated organizations.</td>
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<td><strong>BP-14</strong></td>
<td>Page 5-4 As a pedestrian/cycling family (albeit no longer in that community) it is never an enhancement to add more vehicles...</td>
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<td><strong>BP-14</strong> As detailed in EIR Section 4.2.3, the volume to capacity increase at La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way, and at Torrey Pines Road between La Jolla Village Drive and Glenbrook Way, would not exceed 0.02. Therefore, traffic impacts associated with the proposed project would be less than significant.</td>
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- cars, delivery trucks, garbage trucks, and all those required to construct the development.

BP-15 Page 8-7 Is the new development considered a means to contribute to the financial stability of an international organization?

BP-16 Page 8-7 I think that the inviting entrance to the community aspect is best addressed by the community — and not by representatives of an international organization.

BP-17 Page 3-1: Wouldn’t the Cliffridge property have to be brought up to the requirements of the LJSFDO?

BP-18 3.2.2: There is a strikeout through UCSD Hillel Center ... is that to indicate that this is not a UCSD affiliated center?

BP-19 p3.4 Israel-Oriented Activities: Why the strikeout of UCSD in this paragraph?

BP-20 Page 4.1-19: When the crafters of the La Jolla Shores Design Manual crafted their document, and the then community approved it, no-one could have conceived that a UCSD institutional use (whether official or not) would ever be considered in the LJSO area, since at that time there was an agreed upon buffer area, with UCSD to be separated from the residential area. The Open-Space element was honored, and the parks were still open to children who were not fee paying through lease agreements for sport. No matter how many times the plans are drawn and redrawn, this is an institutional use that does not comply in a single family residential neighborhood, and originally would have been developed in the urban node to the east of UCSD.

Thank you for the opportunity to submit additional comments.

Sue Moore

Submitted via email, on 02.11.14, with a hard copy mailed on the same day.

BP-15 This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

BP-16 This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

BP-17 See the response to comment BP-6.

BP-18 See response to comment BP-5.

BP-19 See response to comment BP-5.

BP-20 Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “... is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
BQ-1 The commenter was included on the list of names the Public Notice of Availability of an EIR was sent to either via email or by mail. All comments on previous versions of the EIR have responses and are included in the Final EIR.

BQ-2 The previous recirculated EIR (January 2013) did not include redlining or underlining, nor did the current recirculated EIR (December 2013). The Preface to the recirculated EIR in both versions provided an overview of the revisions made to each document.

The Preface states:

Section 15088.5(g) of the CEQA Guidelines requires a summary of the revisions made to the previously circulated Draft EIR. The following is a summary of the environmental analysis revisions completed.

Planned development projects within the vicinity of the project site have been added to Chapter 7, Cumulative Impacts. The traffic impact analysis and other environmental issues have been revised as applicable.

Additional information includes a construction traffic analysis, an updated biological survey, an updated analysis on the potential for on-site generated noise, and further clarification of the Phase 1/Phase 2 project (such as the size of the street vacation, street dedication, easements, and lot coverage).

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<td>BQ-5</td>
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The Final EIR contains responses to all comments received during the first, second, and third public review periods. Response to this author’s comments is specified in the Index.

As detailed in Section 4.2.3, the volume to capacity increase at La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way, and at Torrey Pines Road between La Jolla Village Drive and Glenbrook Way, would not exceed 0.02. Therefore, impacts would be less than significant.

Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “... is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

With regard to locating the project within an existing synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff.
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<td>BR-3</td>
<td>Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.</td>
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<td>While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.</td>
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<td>BR-4</td>
<td>The commenter does not specify the location of a site that is referred to. However, the EIR (Chapter 9) includes a discussion of alternative locations to the project site.</td>
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<td>With regards to pedestrian safety, EIR Section 4.2.5.1(a) explains that pedestrian access to Phase 1/Phase 2 is planned via a non-contiguous sidewalk encompassing the facility with the primary walkway into the facility being located off La Jolla Village Drive. This location was chosen to provide a safer route into the center than through the driveway where cars will be maneuvering in and out, and since the crosswalks from the UCSD campus along La Jolla Village Drive are located on both ends of the walkway.</td>
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|        | BR-4 (cont.)  
A new pedestrian curb ramp would be constructed on Cliffridge Avenue towards the front of the Cliffridge property. This improvement would ensure that traffic hazards to motor vehicles, pedestrians, and bicycles would be less than significant. |
|        | BR-5  
See response to comment BR-2. |
Under CEQA, a public agency must determine what, if any, effect on the environment a proposed project may have. To do so, a public agency must first make a fair assessment of existing physical conditions (i.e., baseline physical conditions when the NOP was issued) and then compare it to the anticipated or expected physical conditions if the project were to be completed, thereby allowing the agency to focus on the nature and degree of changes expected in those physical conditions and whether those changes result in any significant effect on the existing environment (CEQA Guidelines §15125). The NOP for the project was released in 2010 and the evaluation within the EIR is based on those conditions as required under CEQA.

Project occupancy would be restricted. As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific
measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently
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<td>BS-1 cont.)</td>
<td>using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.</td>
</tr>
</tbody>
</table>
| BS-2 | The project complies with zoning and is an allowed use at this location. Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “…is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code. |
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With respect to sharing space with the neighborhood synagogues, see response to comment BR-2.
This comment is an introduction to the comments that follow. No further response is required.

Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “…is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

Section S5 of the EIR is within the Executive Summary, which does not fully analyze project alternatives; rather it only summarizes the findings contained within EIR Chapter 9.

With respect to the project’s analysis of alternative locations, CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided.
or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

> The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected.

The proposed location of the project is not a CEQA issue to be reevaluated in a CEQA alternative. With respect to its allowance at this location, see response to comment BT-2. The project alternatives were all adequately evaluated and as detailed in the EIR, due to transportation constraints along La Jolla Village Drive access to the Site 675 Alternative would require entrance from
<table>
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<th>LETTER</th>
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<td>BT-4 (cont.) Scholars Drive South, which is on the UCSD campus. From there, construction of a road of several hundred feet through a grove of mature eucalyptus trees would be required. It, therefore, has greater environmental constraints and potential impacts compared to the proposed project.</td>
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<td>BT-5 See response to comment BT-3. See also EIR Sections 9.1 and 9.2.4 for a discussion of alternate locations.</td>
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<td>BT-6 The project objectives detailed within the EIR include the underlying purpose of the project. The project would accommodate mostly students and is required to be in close proximity to campus activities. As detailed in EIR Section 9.1, alternative locations were analyzed on more than just the south side of UCSD campus and none were rejected based on their location. No alternatives were rejected because they were not on the south side of campus.</td>
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As detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming that all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.
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<td></td>
<td>BT-8 The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.</td>
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<td>The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.</td>
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<td>BT-9 See response to comment BT-8.</td>
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<td>As detailed in DEIR Section 4.2.5.1(a), vehicles may currently use the La Jolla Scenic Drive North cul-de-sac as a turnaround area. As shown in Figure 4.2-2 during the AM peak hour (highest hour between 7-9 a.m.), no vehicles turned into the cul-de-sac from La Jolla Scenic Drive North, and only two vehicles turned into the cul-de-sac from Cliffridge Avenue. Only seven vehicles turned into the cul-de-sac during the PM peak hour (highest hour between 4-6 p.m.).</td>
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<td>Phase 1/Phase 2 would vacate the westerly cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. The vacation of the street right-of-way and street reconfiguration will provide pedestrian improvements at this location.</td>
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<td>A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla</td>
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<td>BT-9 (cont.) Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.</td>
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<td>BT-10 The comment is a conclusion to the previous comments. No further response is required.</td>
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</table>
Ms. E. Shearer-Nguyen  
City of San Diego Development Services Center  
1222 First Avenue, MS501  
San Diego, CA 92101  
DSDEAS@sandiego.gov

Subject: UCSD Hillel Center for Jewish Life, Project No. 212905  

Dear Ms. Shearer-Nguyen,  

Thank you for providing the Recirculated Draft EIR for the subject project, previously known as Hillel of San Diego Student Center II. Please see my comments addressing the accuracy and completeness of the above referenced document.  

Notification/Communication  

In August 2011, we received the Notice of Application from the Development Services Department. Upon receipt, I contacted John S. Fisher and asked to be notified of any future developments related to this project. We did not receive any further information. We did not receive notice of the availability of the Draft Environmental Impact nor did we receive notice of the recirculation.  

- I notice on Page 7-8 Public Review that none of my direct neighbors are included as receiving a copy or notice of the draft EIR and being invited to comment on its accuracy and sufficiency.  
- How did the City notify people – especially those who live within 100 feet of the project?  
- At the request of a neighbor who does not own a computer and does not have internet access, I called Development Services Department at (619) 466-5460 to ask what alternative formats were available. I was told I could come downtown and have a copy made. When I asked how much it would cost, the lady said she didn’t know. I asked could she estimate and she said no. I asked if it would be available at a local library and she said no. I asked what other “free” alternative formats were available. The receptionist became annoyed with me and hung up. I called back several times and no one answered the phone. I was appalled at the unprofessional behavior. I called back at a later date and spoke with a supervisor who then told me that the document should be at the library. I wonder how many other members of the public had difficulty finding or accessing alternate formats?  
- What is the cost to make a copy of this document?  

Significant OMISSIONS and INACCURACIES are as follows:

BU-1  

This letter was fully responded to as part of the recirculated EIR (January 2013). Please see letter AO.
Project Description - A clear, complete, consistent Project Description for each Project Alternative is not provided. For example, (page 9-17) Site 675 is identified as “the only vacant and available City-owned site in La Jolla. The heavily sloping 13,000-square-foot property is located at the intersection of La Jolla Village Drive and Gilman Drive, surrounded by UCSD lands.” No map or APN is provided. It is unclear exactly where this parcel is located.

Right-of-Way Vacation: The AEIR fails to properly determine whether the proposed Right-of-Way Vacation (which is required for the project) is lawful. Findings for a street vacation by the previous City Council have been set aside by the courts. The proposed street vacation must go through the review process again. SDMC Section 125.0941 requires that ALL of the following findings must be made to approve a street vacation:

a. There is no present or prospective public use of the public right-of-way, either for the facility for which it was originally required or for any other public use of a like nature that can be anticipated;
   i. There is a present and prospective public use for the right-of-way. While a park has significant value, it would come at the cost of losing a current cul-de-sac in the right-of-way which is being used for both vehicular traffic and parking.

b. The public will benefit from the action through improved use of the land made available by the vacation;
   i. There is a loss of benefit in that parking will be lost and the street will be narrowed. Decreasing the width of the street is problematic and a safety issue.

c. The vacation does not adversely affect any applicable land use plan; and
   i. The vacation is for the purpose of developing a facility, which is at odds with the surrounding low density residential use, and is contrary to the La Jolla Shores Planned District Ordinance.

d. The public facility for which the right-of-way was originally acquired will not be detrimentally affected by the vacation;
   i. Vehicular traffic will be affected and the cul-de-sac providing both a place for turning around and parking will be lost.
LETTER

J. Craig Venter Institute - The dEIR fails to address the impact of development of the Upper Mesa Neighborhood on Transportation/Circulation/Parking. This site located (directly across the street to the west) at the northeast corner of the SIO campus bounded by Expedition Way, North Torrey Pines Road, Torrey Pines Road, the City of San Diego’s Allen Field and the Skeleton Canyon Ecological Reserve of the UCSD Park.

a. There are projected to be 4 buildings on this site.
b. Construction is currently underway on the first building – the J. Craig Venter Institute which will be 45,000 gross square feet and will support 125 people.
c. Access to the project will be via a right-in and right-out driveway on Torrey Pines Road and a raised median will be constructed on Torrey Pines Road from La Jolla Village Drive to prevent left turn in cut movements.
d. Vehicles leaving the Institute and going to the freeway will need to
   i. Continue down Torrey Pines Rd to La Jolla Pkwy (unless they want I-5 N)
   ii. U-turn at Torrey Pines Rd and Glenbrook Way to return to La Jolla Village Dr.
   iv. Left turn at Glenbrook, travel through the neighborhood to La Jolla Village Dr. This short-cut will eliminate the long signal at Torrey Pines Rd.
e. For more info – see http://www.jcvi.org/cnsu/environment-and-sustainability/greengenes-documentation/

Local Planning Groups - The dEIR fails to mention that this project (in its many iterations) has historically been denied by the local planning group. For this version of the project:

* From the 6/7/12 minutes: La Jolla Community Planning Association
  i. Findings cannot be made for the right-of-way vacation,
  ii. Findings cannot be made for the continued existing office use of the single-family dwelling: 8976 Cliffridge Avenue. Inconsistent with the La Jolla Shores Planned District Ordinance (Phase 1, at the present time and also Phase 2, if not approved).
  iii. Findings cannot be made for a Site Development Permit because the proposed development is not consistent with regulations of the Land Development Code; specifically, proposed use is not allowed by the La Jolla Shores Planned District Ordinance.

RESPONSE

RTC-787
Site Development Permit for Phase 1/Phase 2: SDMC Section 126.0504 requires that all of the following findings must be made to approve a site development permit:

a. The proposed development will not adversely affect the applicable land use plan
b. The proposed development will not be detrimental to the public health, safety and welfare, and
c. The proposed development will comply with the regulations of the Land Development Code, including any allowable deviation pursuant to the Land Development Code.

The size and bulk of the project is two to three times that of other structures in the vicinity and therefore are not in conformance with the La Jolla Shores Design Manual. The project will be disruptive of the architectural unity of the area. The proposed structure setbacks are not in general conformance with the setbacks of other structures in the vicinity.

Phase 1/Phase 2 Option: Hillel is proposing "three individual structures with an overall building square footage of approximately 6,500 square feet, situated around a central courtyard" (page 3-8).

- These three buildings are grouped together around a courtyard. They appear as one large structure as opposed to three distant buildings spread out evenly on the lot.
- This is in SIGNIFICANT contrast to the homes directly across the street. These lots are approximately 10,000 square feet in size with homes of approximately 2,000-2,500 square feet set in the middle of each lot.
- The bulk and scale of this building is NOT consistent with the La Jolla Shores Design Manual guidelines of "unity with variety" and "bulk & scale".

Existing with Improvements Option: Hillel is proposing to convert a single-family home at 8976 Cliffridge Ave to permanent office and administrative use for Hillel.

- Using a single-family home for administrative offices is not an allowed use within the single family residential zone of the La Jolla Planned District.
- Wouldn't being able to buy/sell/lease single family homes as offices be a SIGNIFICANT impact for both Land Use and Neighborhood Character?
Land Use Precedent: Municipal Code Section 15100303(e) (Single-Family Zone – permitted uses) allows "churches, temples, or buildings of a permanent nature, used primarily for religious purposes.

Page 6-3 states "While there is a potential for other UCSD student religious organizations to seek off-campus facilities in the project area, the constraints of finding a suitable site would be a limiting factor. The area in which the project is proposed in mostly developed, with UCSD and Scripps in close proximity to the project site as well as existing residential uses. Therefore, development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively."

- If the Municipal Code is interpreted to allow a student center with a religious affiliation, then would other religious organizations be able to buy single-family homes in this neighborhood and convert them to provide a place for "learning, community-building, and spiritual counseling"?
- There are currently 60 "registered" student organizations at UCSD with a "spiritual" focus — see http://orgs.ucsd.edu/studentorgregistration/?doOnlyList.aspx?frmFocus=18.
- Hillel is not a "registered" UCSD organization. As such, there are potentially more than 60 religiously-affiliated organizations at UCSD. These organizations, like Hillel, may have national charters with the resources to buy single-family homes in this residential neighborhood. They could then site Hillel as a precedent to obtain a similar Site Development Permit.
- Setting this precedent will forever change the use and character of this single-family neighborhood!
LETTER

Proposed Use (page 3-16/19): Hillel is proposing the following use:

- Regular hours of operation: Monday through Friday 9am to 10pm
- Open during the evenings and on weekends if there is an activity planned
- 600 expected activities per year (150 per academic quarter)
- 32 expected activities per year with attendance between 41-50 students
- 200 expected daily "trips" to HCJL

"Shabbat services, concerts, high-holiday services, distinguished speaker events, and other large gatherings would continue to be held on campus in rented facilities."

Hillel provides 'expected' hours, activities, and trips. These "expectations" are not binding on the future use of the facility. There is no Conditional Use Permit that would govern hours of operation, attendance, number of activities. What is to prevent "large gatherings" from being held at the HCJL in the future?

What is the MAXIMUM ALLOWABLE OCCUPANCY?
What is the maximum allowable occupancy including the external courtyard?
What is to prevent "large gatherings" from being held at the HCJL in the future?
The industrial kitchen is built to accommodate such activity.
Is there a Conditional Use Permit that would restrict hours of operation, attendance and number of activities? Is not, would the applicant accept a CUP?
Is this "Proposed Use" consistent with the activity of a single-family home?

RESPONSE
Transportation/Circulation:

The project would result in SIGNIFICANT IMPACTS related to transportation, circulation, and parking.

Hillel estimates 80% of students will walk to the facility, 20% will drive/carpool — this is a BEST case scenario. This is based on student-surveys conducted in 2010, three years ago. The DEIR fails to consider the impact of a realistic or worst-case scenario — 80% of students drive and 20% walk.

Traffic Hazard #1: Making access to the vacant site associated with Phase 2 would be a right-in/right-out driveway on La Jolla Scenic Way (a mere 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way signalized intersection — with two left turn lanes). The DEIR fails to consider project access from La Jolla Scenic Drive North due to conflicts with driveways serving the residences. As a resident on La Jolla Scenic Drive North, I would like to see some analysis of moving the project access to La Jolla Scenic Drive North which appears to be the much safer option.

Traffic Hazard #2: The DEIR fails to discuss the traffic hazard of reducing the street width of La Jolla Scenic Dr. North by 2 feet (to 34 feet). Corners will be non-standard and the cornering radius will be non-standard. It also fails to provide an accurate description of the existing street — heavily parked on both sides of the street (even with 2 hour parking), heavy use by residents, people cutting through the neighborhood bypass the signal at Torrey Pines Road (which will be re-purposed by the帏er Institute), students looking for parking, theatre-goers looking for parking and people who just get lost trying to go to downtown La Jolla. This is not a typical residential street. It is a major thorough-fare.

Traffic Hazard #3: The DEIR fails to address the non-standard corners that currently limit visibility. This situation will be worse if the stop sign is removed at Cliffridge Ave. and La Jolla Scenic Dr N. Drivers will not slow around a corner and will not be able to see residents backing out of their driveways.

Appendix B, Traffic Impact Analysis:

- OMISSION – Referenced Appendices are not included (e.g., Appendix D—historical program guide, Appendix E—map of each Hillel’s location, Appendix F—survey data)
- Survey data is three years old, from March 2010 & October 2010
Parking (page 3-20) “There are no specific parking regulations for the proposed use of Phase 2 of the HCIL in the City’s Municipal Code, therefore a use-specific parking study and analysis was completed for the HCIL. . . . A total of 27 spaces are proposed.”

- INCORRECT: SDMC 142.053(c) sets the parking standards for churches or places of religious assembly at 1 per 3 seats, or 1 per 60 inches or pew space or 30 per 1,000 square feet. If Hillside is to be considered a permanent religious structure used primarily for religious purposes than the appropriate standard is 30 spaces / 1,000 square feet or 193 spaces.
- If Hillside is not to be considered a permanent structure used primarily for religious purposes, then it is not allowed in the single family zone.
- Where in the SDMC does it allow for a “use-specific parking study and analysis” to determine required parking?
- Figure 3-8 is difficult to view details. The north parking lot appears to have 8 spaces (including 2 handicapped spaces). The mid-lot appears to have 10 parking spaces. And the south parking lot appears to have 8 spaces. This only adds to 26 parking spaces. Where is the 27th space?
- The traffic analysis doesn't address the impact of losing 12+ existing on-street parking spaces in a Parking Impact Overlay zone (4-5 spaces on the cul-de-sac, 7 spaces on La Jolla Scenic Way, and 77 spaces on Torrey Pines Road due to the Veiter Institute.
- The deIR incorrectly determines Parking Demand (page 4.2-33 and Appendix B) based on site-specific surveys from UCLA Hillside (where parking is provided via a pay student lot across the street), UCSD Hillside, and UCSD Hillside (is it appropriate to use a survey from the site being evaluated?) and based on average parking rate for California Hillside (again, averages are miscalculated as UCLA Hillside parking is not available on-site, but via a student parking lot across the street).
S.0. Executive Summary

S.1.1. Project Location and Setting

The draft EIR and associated technical documents posted online include:

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<th>Appendix</th>
<th>Title</th>
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<tr>
<td>Appendix G</td>
<td>Noise Report Revised</td>
<td>57 pages</td>
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<td>Appendix C</td>
<td>Biology Letter</td>
<td>22 pages</td>
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<td>Draft EIR</td>
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<td>369 pages</td>
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<td>Appendix F-2</td>
<td>Historic Review</td>
<td>35 pages</td>
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<tr>
<td>Appendix B</td>
<td>Traffic Report</td>
<td>63 pages</td>
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<td>Appendix I</td>
<td>Hydrology Report</td>
<td>17 pages</td>
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<tr>
<td>Appendix D</td>
<td>Geologic Reconnaissance</td>
<td>15 pages</td>
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<td>Appendix A</td>
<td>NOP Comment Ltr</td>
<td>178 pages</td>
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<tr>
<td>Appendix F-1</td>
<td>Cultural Resources Report</td>
<td>44 pages</td>
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<tr>
<td>Appendix H</td>
<td>Water Quality</td>
<td>51 pages</td>
</tr>
<tr>
<td>Appendix E</td>
<td>Greenhouse Gas Report</td>
<td>92 pages</td>
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<td>Public Notice and draft EIR</td>
<td>160 pages (duplicate?)</td>
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The total pages (without duplicate) is 953 pages.

Given the volume of information provided, it is critical to include in the Executive Summary a clear, consistent project description for each Project Alternative. It is difficult to understand and find the information to compare each Project Alternative. Please provide a summary comparison, for each of the following Project Alternatives:

1) Phase 1/Phase 2 project
2) Existing with Improvements Option
3) No Project Alternative
4) Reduced Project Alternative
5) Site 675 Alternative

Please provide:

a) Project site location and with specific boundaries (with map): I have a general idea of where Site 675, but I'm not sure of the specific boundaries?

b) The Right-of-Way vacation specifics are not described in any detail? What are they for each alternative?

c) What is the project site with and without the proposed right of way vacation

d) Is the alternative a viable option if the ROW vacation is denied?

e) What is being requested for each alternative (i.e., Site Development Permit and/or Public Right-of-Way Vacation)

f) What is the maximum allowable occupancy for each alternative?
Phase 1/Phase 2 Project
Phase 2 calls for the “development of the 0.8-acre vacant parcel” east of the single-family home at 8976 Cliffridge Avenue. The project site is bounded to the north by La Jolla Village Drive, to the east by La Jolla Scenic Way and to the south by La Jolla Scenic Drive.

- What is the square feet / portion of the project site that is currently owned by the applicant?
- What is the square feet / portion of the project site is being requested in the Public Right-of-Way Vacation?
- If the Public Right-of-Way Vacation is denied, would the Phase 1/Phase 2 Project be a viable option?
- What is maximum allowable occupancy of the proposed building (as opposed to the projected occupancy)?

Existing with Improvements Option
Under this option, Hillel would not develop new facilities. Instead, Hillel would permanently use the single-family home at 8976 Cliffridge Avenue for “administrative offices, one-on-one counseling, and meetings with students”.

- What is the specific project site / boundaries of this option?
- Is the project site for this option only the single-family home at 8976 Cliffridge Avenue?
- Is a Site Development Permit required?
- Is using a single-family residence for “administrative office, one-on-one counseling and meetings with students” a currently allowed use under the La Jolla Shores Planned District Ordinances?
- Does this option include any Public Right-of-Way Vacation (e.g., for the cul-de-sac)?
- What is maximum occupancy allowable?

No Project Alternative
DEIR Summary page 4. Under the No Project Alternative, “existing conditions on the Cliffridge property and vacant site would be retained”.

- Is the project site for this option only the single-family home at 8976 Cliffridge Avenue?
- Does this option include any Public Right-of-Way Vacation (e.g., the cul-de-sac)?

- How long has the applicant been allowed to use a single-family residential home at 8976 Cliffridge Avenue for “administrative offices, one-on-one counseling, and meetings with students”?
- Is this an allowable use under Municipal Code Section 1510.0303(e) or the LJ Shores Planned District Ordinance?
- Is there currently an Open Code Violation for the use of the single-family home at 8976 Cliffridge?
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| • If the No Project Alternative is selected, would the current practices at single-family home at 8976 Cliffridge Ave. be allowed to continue even though they are in violation of the code?  
• Does the DEIR take into account the impact to the neighboring house that is directly adjacent to the single-family home at 8976 Cliffridge Ave? Has this neighbor been notified of the proposed actions?  
  
DEIR Summary page 4: Under the No Project Alternative it states, the No Project Alternative would “not maximize use of land owned by the applicant”.  
  
- Is the single-family home at 8976 Cliffridge Ave. owned by the applicant? If not, then who owns this property and does the applicant have a right-to-use?  
- If the Site Development Permit and Public Right-of-Way Vacation are denied, then what are all options available to the applicant with regards to the “land owned”?  
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| **Reduced Project Alternative**  
DEIR Summary, page 5: Under the Reduced Project Alternative, “two structures – The Library/Chapel along with the second floor of the HCII Student Center – would be reduced or eliminated” and the use of the single-family home at 8976 Cliffridge Ave. would be “converted to permanent office use.” The document also states the Phase 1/Phase 2 project has been “determined to be the minimum space needed.”  
  
- What is the boundaries of the project site for the Reduced Project Alternative?  
- What is the lot size/square feet for the Reduced Project Alternative?  
- Does the project site for this option include the single-family home at 8976 Cliffridge Ave?  
- Does the Reduced Project Alternative require a Public Right-of-Way Vacation (e.g., in order to vacate the cul-de-sac)?  
- The Reduced Project Alternative does not meet the “minimum space needed” by the applicant. As such, would the applicant add the third building and the second floor of the student center at a later date?  
- What additions/ modifications could be made at a later date?  
- Would the Site Development Permit specifically state that no further additions or modifications would be allowed?  
- What is maximum allowable occupancy?  
|
Site 675 Alternative
DEIR Summary, page S-8: Site 675 is a vacant and City-owned site in La Jolla. The heavily sloping 12,400-square-foot property is located at the intersection of La Jolla Village Drive and Gilman Drive, surrounded by UCSD lands.

- Omission: Boundaries of Site 675 are not clear; please provide a map with boundaries indicated.
- What is the project setting near the Site 675 Alternative?
- What is the zoning of this alternative and the near surroundings?
- Are there any single-family homes within 30 feet of this site?

The Site 675 alternative would result in “greater physical impacts to the environment when compared to the Phase 1/Phase 2 project and the Existing with Improvements Option”.

- Why specifically does the Site 675 alternative result in “greater physical impacts”?

Section 15126.6 of the State CEQA Guidelines requires the discussion of “...a range of reasonable alternatives to the project or to the location of the project, which would be feasible attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project”.

- A “range of reasonable alternatives to the project” is not presented. It is the same project proposed over and over again.
- Omission: An alternative site that has less than or equal physical impacts to the proposed options should be included otherwise it is not really a “reasonable alternative”.
- Were alternative locations on the north and east side of campus considered? If not, why not?
LETTER

Introduction

- Was this project previously known as “Hillel of San Diego Student Center II”?
- Has this project been referred to by other names? If so, what?

Page 1-1, “University of California San Diego (UCSD) Hillel Center for Jewish Life Project (HCJL)”

- The project site includes two parcels: a 0.2-acre parcel (344-131-0100) at 8976 Cliffridge Ave (Cliffridge property) and a 0.8-acre vacant lot (344-120-4300). The site is bounded to the north by La Jolla Village Drive, to the east by La Jolla Scenic Way, and to the south by La Jolla Scenic Drive.

- Does the 0.8-acre vacant lot (344-120-4300) include or exclude the property being requested as part of the ROW vacation?
- What is the size of the ROW vacation being requested? For each Project Alternative?
- What is the lot size of each parcel?
- What is the total lot size of the each of the Proposed Project Alternatives?

Page 1-1, “Hillel of San Diego (Hillel) currently uses the Cliffridge property for administrative offices and one-on-one counseling and meetings with students, but requires additional space for religious programs.”

- Is the “Cliffridge property” a single-family residence?
- Does the applicant own the single-family residence? If not, who does?
- If the applicant does not own the single-family residence, how is it part of the overall project?
- Does anyone currently live in the residence?
- How long has the current use been allowed?
- Is the current use allowed within the La Jolla PDO?
- Is there an Open Code Violation for the current use?
- How long has the current use been allowed?
- Is the single-family residence currently being used primarily for religious purposes?

Page 1-1, “Upon occupancy of the HCJL, the temporary use of the Cliffridge property would cease and the property would revert to a single dwelling unit use.”

- Would the single-family residence be sold or rented?
- Would the ownership of the property change?
1.0 ENVIRONMENTAL SETTING:

Page 2-5, 2.3.1 Landcover

“The property also contains a portion of La Jolla Scenic Drive North within the western corner of
the site, and the sidewalk along the northern perimeter”.

- Specifically, what portion of La Jolla Scenic Drive North is included in the project site?
- Does the applicant own the “sidewalk along the northern perimeter” or is this being
  requested in the ROW vacation?

Page 2-5, 2.3.1 - “Due to the developed condition of the project site, it does not contain natural
habitat and provides minimal wildlife foraging and sheltering opportunities”.

- The undeveloped lot is overrun with gophers. Birds of prey are often seen perched on the
  bump posts at the site.
- Birds of prey are often seen in pairs as this may also be a nesting area.

Page 2-5, 2.3.2 Topography, “The...project site...is bounded by steep, cut slopes on the north
and east.”

- What are the exact cut slopes to the north and east?
- What is the proposed grading for those slopes?

Page 2-11, 2.5.1 City General Plan “This strategy encompasses smart growth principles by
aiming to preserve remaining open space and natural habitat and redirect development to areas
with available urban amenities.”

- What is the current zoning of the 0.8-acre vacant lot (APN 344-420-4000)?
- Was the 0.8-acre vacant lot ever zoned as “open space”?
- When was the zoning designation changed?
- Why was the zoning designation changed?
- Has the 0.8-acre vacant lot ever been considered a transition zone between the UCSD
  campus and the adjacent residential community?
- How would developing the vacant lot be consistent with “preserving remaining open
  space and natural habitat”?
- Are there existing “available urban amenities” within 1 mile of the proposed site?
2.0 PROJECT DESCRIPTION

Page 3-1 “Hillel currently uses the Clifford property for administrative offices and one-on-one counseling and meetings with students.

- How long has Hillel been using the single-family home at 8976 Clifford Ave. for this purpose?
- Is this an allowed use under the Section 1510.0303 of the PDO?
- Is there an open code violation related to this use?
- Why is the City of San Diego not enforcing this code violation?

Page 3-1, “The permanent use of the Clifford property would require additional on-site parking to rectify a code violation.”

- Is using a single-family home for “administrative offices and one-on-one counseling and meetings with students” an allowed use under Section 1510.0303 of the PDO?
- INACCURACY: The above sentence implies that additional parking is the only issue to rectify the code violation when in fact this is not an allowed use under the PDO.

3.1 Project Objectives, Page 3.2:

“Provide a permanent religious space in a centralized location for Jewish students at UCSD which, because of separation of church and state issues, cannot be built on the UCSD campus built is located close to UCSD to serve students where they live and attend classes.”

- This proposed project is “For Jewish students at UCSD” Is the HCIL the same in substance and form to a house of worship such as a church, temple, synagogue or mosque?
- Municipal Code Section 1510.0303(e) (Single-Family Zone – permitted uses) allows “churches, temples, or buildings of a permanent nature, used primarily for religious purposes”. The language of the code is meant to include all houses of worship – churches, synagogues, temples, mosques.
  - Isn’t the language of the code meant to include all houses of worship (e.g. churches, synagogues, temples mosques, etc)?
  - If the Municipal Code is interpreted to allow a student center with a religious affiliation, then would other religious organizations be able to buy single-family homes in this neighborhood to provide a place for “learning, community-building, and spiritual counseling”?
  - If so, wouldn’t this SIGNIFICANTLY change the character and use of this neighborhood from single-family residential use into mixed-use?"
Page 3-2. “Contribute to the longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses on a property owned and maintained by Hillel for use by UCSD students.”

- Why is the project objective restricted to a “property owned... by Hillel”? Doesn’t this restrict possible Project Alternatives?
- Could the applicant fulfill the religious mission of HCIL by providing a facility via a long-term lease?
- Are there any Hillel facilities that are rented or leased?

Page 3-2. “Contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.”

- INCORRECT: This objective is arbitrary and should be removed or revised:
  - Since students live and attend classes throughout the UCSD campus — not just on the southern portion — why is the goal restricted to the “southern portion of the UCSD campus”?
  - Why is the walkable distance set at 1/4 mile? If a student has a class on the northeast side of campus, wouldn’t it be more than 1/4 mile to reach the proposed project site?
  - UCSD offers an extensive ‘free’ shuttle system for students that travels throughout the campus, the UTC area, to UCSD Medical Center in Hillcrest, Thoron Hospital in La Jolla, and UCSD La Jolla Medical Center. Why is only the southern portion of the UCSD campus being considered for this student center?
3.3 DISCRETIONARY ACTIONS

Page 3-6: 3.3.1.1 Site Development Permit

“SDMC 1510-0101 clearly states the purpose of the PDO is to protect the distinctive residential character of the La Jolla Shores Area and that development should be controlled so as to enable the area to maintain its “distinctive identity as part of one of the outstanding residential areas of the Pacific Coast.”

- Is allowing a 6,500 square foot Student Center a single-family residential zone consistent with protecting the residential character of the neighborhood?
- For the Existing with Improvements Option – is allowing a single-family home to be converted for administrative offices an allowed use in a single-family zone?
- Did the local planning groups (e.g., La Jolla Community Planning Association) recommend approving a SDP for this project?
- If not, why not?

Page 3-6: 3.3.1.3 - Street Right-of-Way Vacation

“The Phase 1/Phase 2 project proposes to vacate an unimproved portion of the existing La Jolla Scenic Drive North, a public street ROW, which requires approval of a street ROW vacation and a vacation of an improved substandard cul-de-sac, along the west end of the east-west trending La Jolla Scenic Dr North.”

- It is hard to understand the specifics of the ROW vacation from this description.
- From Figure 3-1, it appears that the ROW vacation includes (1) the cul-de-sac and (2) a portion of the street La Jolla Scenic Dr North and (3) a portion of the open space along La Jolla Scenic Dr. North – is that correct?
- What is the square feet of the ROW vacation for the cul-de-sac?
- What is the square feet of the ROW vacation for the existing street?
- What is the square feet of the ROW vacation for the open space along the street?
- What is the total square feet of the ROW vacation?
- What is the square feet of the Project 1 / Project 2 alternative without the ROW vacation?
- What is the square feet of the Project 1 / Project 2 alternative with the ROW vacation?
- Would the ROW vacation narrow the existing street by 2 feet, from 36 feet to 34 feet?
- If the ROW vacation is NOT approved, is the Phase 1 / Phase 2 alternative still a viable option? If not, why not?

Page 3-6: “There is currently no sidewalk along the northern side of La Jolla Scenic Drive North.”

- There is a very well established footpath along the northern edge of La Jolla Scenic Drive North. Would the Phase 1 / Phase 2 Alternative provide for a sidewalk where the existing and often used footpath currently is?
Letter Response

Page 3-6, 3.3.2 Existing with Improvements Option

"Per the Parking Impact Overlay Zone, lots less than 10,000 square feet in residential zones are required to be limited to off-street surface parking for a maximum of four vehicles. The Existing with Improvements option would require a deviation to provide six on-site parking spaces for employee use."

- Per Figure 3-2, it looks like the entire backyard is being converted to parking - is this correct?
- If this house were to be sold in the future, who would buy a house with a completely paved backyard?
- Isn't a Site Development Permit also required for development within the LJSPD?
- Is converting a single-family home for "administrative offices and one-on-one counseling and meetings with students" an approved use?
- Did the LJCPA recommend approval or denial of such a use?
- Isn't using a single-family residence as an office a SIGNIFICANT impact to "Land Use" and "Neighborhood Character"?
3.4 PROJECT FEATURES

3.4.1.1 Phase 1/Phase 2

Page 3-8, "The site plan for Phase 2 is shown in Figure 3-4. Phase 2 would consist of the construction of three individual structures with an overall building square footage of approximately 6,500 square feet, situated around a central outdoor courtyard."

- This is a very limited description?
- It is very difficult to view/read Figure 3-4 and as such a more detailed description would be helpful.
- Figure 3-4 says "A New Site Wall. Refer to Civil drawings for top and bottom of wall elevations"—what does this mean? For example, what would be the visual effects to the single-family homes directly across the street on La Jolla Scenic Dr north? Is there a "retaining wall"—how long is it? How high is it? How far is the wall setback from the street? Is this wall, set-back consistent with the single-family homes across the street?
- What are the dimensions of the "trash and recycling enclosure"? It is located on the southeast corner—will it block the view so people can drive/safely in/out of the site?
- B- Proposed double-yellow street striping centered in street. Refer to General Note below. Where is the General Note below? Where exactly is the proposed double-yellow street striping?
- 2. Existing stop sign to be removed. Why is this stop sign being removed? This would create a TRAFFIC HAZARD given the acute turn at this corner. If cars are not required to stop at this corner, will be able to see and stop in time if the residents at 8078 Cliffridge or 8876 La Jolla Scenic Dr N are backing out of their garages?
- From Figure 3-4—there appear to be many changes that are not described in detail in the
  This is a very difficult to read—please describe in the document any changes to the current environment?
- Are there missing pages/figures?
  o Page 3-8
  o Figure 3-2 (page 3-9)
  o Figure 3-3 (page 3-10)
  o Missing Page or Figure??
  o Page 3-12 (blank)
  o Figure 3-4 (page 3-13)
  o Missing Page or Figure??
  o Page 3-15
3.4.2 PROPOSED USES

a. Operations, Page 3-16: “Hillel contemplates regular hours of operation between Monday through Friday, 9am to 10pm…”
   - “Contemplates”? What would exact hours of operation be?
   - What would be the recourse for the families living nearby if hours were extended—specifically later at night?
   - Are these “regular hours of operation” consistent with the hours of operation of a single-family residence?
   - Having people coming and going until 10pm at night (and possibly longer for clean-up) is going to be very noisy from people lingering to talk in person or on the phone or car alarms beeping. Isn’t this a SIGNIFICANT difference in use?
   - This “use” SIGNIFICANTLY changes the overall Neighborhood Character.

b. Operations, Page 3-19: “Based upon the UCSD Hillel’s Winter 2010 quarter program log, of the 133 activities that were held... 8 activities had attendance of between 41-50 students”
   - What is the MAXIMUM ALLOWABLE OCCUPANCY?
   - What is the maximum allowable occupancy including the external courtyard?
   - 133 activities for winter quarter. So would that be approximately 332 (133 * 2) activities for the year?
   - Would that be approximately 32 (8*4) activities with attendance of between 41-50 students or 2.6 per month?
   - INACCURACY – this is an artificial expectation of use. Given the new, larger permanent facility – is it fair to use past program logs as a measure of future program activities?
   - For comparison with existing land use and Neighborhood Character, how often does a single-family residence hold activities with attendance between 41-50 people (it would be once, maybe twice a year at my house)?

Page 3-19: “Total daily “trips” to the HCJL is expected to be approximately 200, inclusive of Hillel staff... Shabbat services, concerts, high-holiday services, distinguished speaker events, and other large gatherings would continue to be held on campus in rented facilities.”
   - For comparison purposes, what are the total daily “trips” of a single-family residence (such as those directly across the street)? Is there a significant difference?
   - What if rented facilities on campus are no longer available or become too expensive? Is there anything restricting Shabbat services, concerts, high-holiday services, distinguished speaker events, and other large gatherings from being held at the HCJL?
   - Will a Conditional Use Permit be in place that will restrict such use?
b. HCIL Student Center, page 3-19

"The student center would be a total of 3,682 gross square feet. With the parcel two-story design, the total gross square footage of Phase1/Phase2 is calculated as 4,287 square feet......the HCIL would include...a kitchen...men’s and women’s restrooms with showers, two exterior balcony areas."

- I don’t understand. Is the HCIL 3,682 square feet or 4,287 square feet?
- Figure 3-5 is difficult to read. Please describe in more detail this building – for example:
  - What is the square feet of the restrooms?
  - Does the men’s restroom include: 2 toilets, 3 sinks, and one shower?
  - Does the women’s restroom include: 3 toilets, 3 sinks, and one shower?
  - What is the square feet of the kitchen? Is it approximately 400 square feet?
  - Does the kitchen include an 8-burner stove? And two refrigerators?
  - This appears to be an industrial size kitchen. Why is the kitchen three times larger than those in the single-family neighborhood?
  - Why is such a large kitchen required? What types of activities would require such a large kitchen if larger gatherings will continue to be held on rented facilities on campus?
  - Are the restrooms / kitchen square feet comparable in size to a single-family home in the area?
  - One of the exterior balcony areas is on the south-east side of the student center. What will be the noise impact on the single-family homes directly across the street of students talking outside at 9pm at night on the balcony and in the courtyard?
  - Will smoking be allowed on the exterior balcony areas? In the outside courtyard?
e. Parking, page 3-20 “There are no specific parking regulations for the proposed use of Phase 2 of the HCCL in the City’s Municipal Code; therefore a use-specific parking study and analysis was completed for the HCCL. A total of 27 spaces are proposed.”

- INCORRECT: SDMC 142.0510 (c) sets the parking standards for churches or places of religious assembly at 1 per 3 seats, or 1 per 60 inches or pew space or 10 per 1,000 square feet. If Hillel is to be considered a permanent religious structure used primarily for religious purposes than the appropriate standard is 30 spaces / 1,000 square feet or 195 spaces.
- If Hillel is not considered a permanent structure used primarily for religious purposes, then it is not allowed in the single family zone.
- Where in the SDMC does it allow for a “use-specific parking study and analysis” to determine required parking?
- Figure 3-8 is difficult to view details. The north parking lot appears to have 8 spaces (including 2 handicap spaces). The mid-lot appears to have 10 parking spaces. And the south parking lot appears to have 8 spaces. This only adds to 26 parking spaces. Where is the 27th space?
- Additionally, how many street parking spaces will be lost:
  - On La Jolla Scenic Dr North (due to ROW vacation)?
  - On La Jolla Scenic Way (due to proposed driveway/entrance)?

f. Open Space / Landscaped Areas, page 3-23 “Approximately 10,000 square feet of landscaping is required; however, the project would provide nearly 20,000 square feet of landscaped open space.”

- If the ROW vacation is allowed, how much landscaping is provided?
- If the ROW vacation is denied, how much landscaping is provided?

Page 3-41, Walls and Enclosures

“Retaining or ate walls would be required and are shown in Figure 3-4. These would be located primarily along La Jolla Scenic Way ( eastern portion of the property to screen the parking area) and La Jolla Village Drive ( northern portion of property at berm and screening walls).”

- Figure 3-4 is not easy to read
- It appears from 3-4 that there is a retaining wall on the south side along La Jolla Scenic Dr North?
- If so, how long is it? How high is it?”
3.4.3 Access and Circulation for Phase 1 / Phase 2

Page 3-45 “Phase 2 vehicular access to the vacant site would be taken from the new parking area entry at La Jolla Scenic Way... For adequate site distance, 25 feet of curb would be painted red just north of the proposed driveway on La Jolla Scenic Way.”

- The description does not provide the reader with an accurate view of how traffic flows at the site location.
- From La Jolla Village Dr turning onto La Jolla Scenic Way – are there one or two left turn lanes?
- La Jolla Scenic Way goes from two-lanes to one-lane after how many feet from the intersection?
- There is a right-only, xx degree turn on La Jolla Scenic Way onto La Jolla Scenic Drive North – how many feet from the intersection?
- The project entry on La Jolla Scenic Way would be how many feet from the intersection at La Jolla Village Dr?
- Is there a risk of cars backing up in the intersection as cars slow to enter the facility?
- Will this be a right-in / right-out only entry?
- How many on-street parking spaces will be lost due to road curving?
- Isn’t La Jolla Scenic Way an unusually heavily trafficked street used by:
  o Neighborhood Residents
  o Parents whose children attend Torrey Pines Elementary School
  o People going to use the La Jolla YMCA
  o People going to the two synagogues on La Jolla Scenic Dr North
  o Students and teachers going to or from La Jolla Shores residents who cut-through the neighborhood to avoid the signal at Torrey Pines Road
- Putting the project entry so close to the intersection at La Jolla Village Drive would create a SIGNIFICANT TRAFFIC HAZARD! Cars turning left from La Jolla Village Drive will not anticipate cars slowing in order to turn into the project site. I know this for a fact as I turn right from La Jolla Scenic Way onto La Jolla Scenic Drive North and it is already dangerous. Making a right turn sooner and closer to the intersection will be even more dangerous!
- Wouldn’t it be significantly safer to put the entry on La Jolla Scenic Dr North where there is less traffic and where it wouldn’t be so close to the intersection?

Page 3-45, “For Phase 2, the existing driveway from the cul-de-sac portion of La Jolla Scenic Drive North to the Clifford property would be relocated.”

- Where and how would it be relocated?
- Is there a Figure to show the new configuration?
Page 3, "The existing stop sign on Cliffridge Avenue at La Jolla Scenic Drive North would be removed, and a new left/curve sign installed on La Jolla Scenic Drive North. By providing a curve, local vehicular circulation would be enhanced so there would no longer be a need for a stop sign."

- What is the turn angle at Cliffridge Avenue and La Jolla Scenic Drive North?
- Removing this stop sign will create a SIGNIFICANT TRAFFIC HAZARD. This is an obtuse angle and it is already difficult for cars turning this corner to see and stop in time when residents are pulling out of their garages. Won’t removing this stop sign make this currently dangerous situation even worse?
- Is there any reason why the stop sign at Cliffridge Ave and La Jolla Scenic Drive North could not be left as is?
- Where would the “new left/curve sign” be installed? How would this sign help drivers turning right from Cliffridge Ave to La Jolla Scenic Dr N?
- People often get lost in this neighborhood – they turn left at La Jolla Scenic Way thinking they are going downtown La Jolla (they want Torrey Pines Road). When they realize they have made a mistake, they use currently use the cul-de-sac to turn around and go back to La Jolla Village Dr. Would people be allowed / able to turn around at the “curve” (because they will want to do this)?

Page 4, "At 34 feet wide, La Jolla Scenic Drive North has been designed to conform to City traffic standards and street design requirements.”

- What is the current street width of La Jolla Scenic Drive North?
- Are you proposing to narrow the street by 2 feet with the ROW Vacation?
- Narrowing La Jolla Scenic Drive North would create a SIGNIFICANT TRAFFIC HAZARD. This is not a typical residential street. It is highly trafficked and when UCSD is in session, cars are parked on both sides of the street throughout the day – even with the 2 hour only parking restriction. Students are driving back and forth searching for an open parking space. It is used as a residents of La Jolla Shores to short-cut the traffic signal at Torrey Pines Road. It has two sharp turns – one at La Jolla Scenic Way and the other at Cliffridge Ave. Wouldn’t it be safer to leave La Jolla Scenic Drive North at the current width?

- Is the following calculation reasonable?

<table>
<thead>
<tr>
<th>34 feet</th>
<th>Proposed street width</th>
</tr>
</thead>
<tbody>
<tr>
<td>(3) feet</td>
<td>18 inch Parking allowance from edge of curb (both sides of street)</td>
</tr>
<tr>
<td>(15) feet</td>
<td>Parked cars – 7.5 feet average width of a car x 2</td>
</tr>
<tr>
<td>(15) feet</td>
<td>Cars driving in both directions (7.5 feet x 2)</td>
</tr>
</tbody>
</table>

1 foot or 12 inches to pass....not much room for error

- Given the unique characteristics of this section of La Jolla Scenic Drive North, wouldn’t it be safer to leave La Jolla Scenic Drive North at the current width?
- Given the objectives, would it be feasible to leave this street at its current width?
LETTER

Page 3-46: “A strip along the property frontage of La Jolla Scenic Drive would be dedicated to the public right-of-way.”

- How much of the property frontage of La Jolla Scenic Drive would be dedicated to the public right-of-way?
- How much of the property frontage is currently dedicated to public right-of-way?

a. Siting and Transportation, Page 3-47

“Phase 1/Phase 2 would be located within less than one-quarter mile of one or more existing stops for Metropolitan Transit System (MTS) bus lines usable by the Center’s students.”

- As students live and attend classes throughout the campus, they will most likely be using UCSD’s elaborate shuttle system that is available free of charge to students. This shuttle system travels throughout the campus, to SIO, to UTC, the Hillcrest medical campus. Where/how far away is the closest UCSD shuttle stop?
3.6 HISTORY OF PROJECT CHANGES

Page 3-49. “In 1999, at the request of Hillel, the City issued a request for proposals for potential sale of the 0.8-acre vacant site historically referred to as Site 653. In 2000, Hillel responded to the request and was awarded exclusive negotiating rights to purchase the site after a public hearing.”

- What are the specific boundaries of the 0.8-acre vacant site? Does it include the land being for which a public ROW is being requested?
- Was Site 653 ever designated as Open Space?
- If so, when was the designation changed?
- If so, what prompted the designation change?

Page 3-49. “In 2003, Hillel established its present location at 8976 Cliffridge Avenue – when the Cliffridge property was acquired by a private nonprofit foundation that supported Hillel. The property was renovated and provided to Hillel on a rent-free basis. Operations at this location allowed Hillel to pursue its religious purposes and mission while development of a permanent space was considered.”

- Hillel has been using a single-family residence for “administrative offices and one-on-one counseling and meetings with students” (see page 3-1) in violation of the municipal code since 2003 – for over 10 years?
- Does Hillel OWN the single-family house at 8976 Cliffridge Avenue or does the private nonprofit foundation still own the home?
- If Hillel does NOT own the property, how is it part of any of the proposed alternatives – Phase 1/ Phase 2? Existing with Improvements? No project alternative?
- Is the foundation going to sell the single-family residence at 8976 Cliffridge Ave to Hillel?
- Is the single-family residence at 8976 Cliffridge Ave being used primarily for religious purposes or for “administrative offices and one-on-one counseling and meetings with students”?

3.6.2 Phase 1 / Phase 2 Project Changes

Page 3-50. “By designing three smaller, individual structures (two one-story buildings and one two-story building), Phase 1/Phase 2 would more closely relate in scale to the adjacent single-family residences along La Jolla Scenic Drive North and Cliffridge Avenue.”

- These three individual structures are clustered together around a central courtyard and appear to be one, large 8,500 square foot building which does not in any way relate in scale to the adjacent single-family residences which are approximately 2,200 square feet in the middle of 10,000 square feet lots.
4.0 ENVIRONMENTAL ANALYSIS

LAND USE

Page 4.1-1, "The project site contains the Clifferidge property that currently serves as the Hillel office."

- INACCURACY: The existing use should be described as a single-family residence at 8976 Clifferidge Ave. A property which is not currently owned by the applicant.
- The use of the single-family home at 8976 Clifferidge since 2003 is an illegal use and there is an Open Violation related to this use.
- OMISSION: What is located to the WEST of the site? What is proposed in the near future to be to the WEST of this site?

Page 4.1-1, "The General Plan Land Use Element identifies the project site in the General's Plans Land Use and Street System Map as Residential."

- Was the project site ever identified as Open Space?
- If so, when was the designation changed?
- If so, how and why was the designation changed?

Page 4.1-5, "The Parking Impact Overlay Zone provides supplemental parking regulations for areas in order to increase parking in areas with parking demand."

- For each Project Alternative...
  - How many parking spaces will be LOST along La Jolla Scenic Dr North & cul-de-sac?
  - How many parking spaces will be LOST along La Jolla Scenic Way?
- Is removing existing street parking in accordance with the Parking Impact Overlay Zone?
LETTER

According to the LJSD Ordinance, "churches, temples, or buildings of a permanent nature, used primarily for religious purposes" are permitted uses within the residential zones (Municipal Code Section 1510.0303(e)).

- Per the Mission Statement (http://acsludel.org/about) "Hillel of San Diego...serves an estimated 5,000 Jewish undergraduate and graduate students at institutions of higher education across San Diego County. Students from all backgrounds are invited to participate in Jewish life on campus. Social, cultural, educational, and community service programs provide opportunities for students to build relationships with each other and develop Jewish community."
- Hillel is a student organization. If the Municipal Code is interpreted to allow a student center with a religious affiliation, then other religious organizations be able to buy single-family homes in this neighborhood to provide a place for "learning, community-building, and spiritual counseling."

Page 4.1-8 "Would the project require a deviation or variance, which would in turn result in a physical impact on the environment?"

d. OMISSION—The DFR only addresses the deviation from Driveway Cut Cut Requirements. It fails to address that findings cannot be made for the ROW vacation or for the SDP as evidenced from the 6/7/12 minutes of the La Jolla Community Planning Association:
  iv. Findings cannot be made for the right-of-way vacation,
  v. Findings cannot be made for the continued existing office use of the single-family dwelling 8976 Cliffridge Avenue. Inconsistent with the La Jolla Shores Planned District Ordinance, (Phase 1, at the present time and also Phase 2, if not approved),
  vi. Findings cannot be made for a Site Development Permit because the proposed development is not consistent with regulations of the Land Development Code. Specifically, proposed use is not allowed by the La Jolla Shores Planned District Ordinance.

c. INACCURACY—Based on the above determination by the La Jolla Community Planning Association, the impact should be considered SIGNIFICANT.

Page 4.1-9 "The Campus Parking overlay requirements would limit the surface parking to four vehicles...would require a deviation to provide six on-site parking spaces for OFFICE USE."

- From Figure 3-2, the entire backyard of this single-family residence will be converted to parking—is this correct?
- If so, this is completely out of character with the existing single-family homes and this proposed deviation will result in a SIGNIFICANT land use impact due to the inconsistency with the land development code.

RESPONSE

RTC-812
4.2 TRANSPORTATION/CIRCULATION/PARKING

Page 4.2-3, “Traffic volumes are based on daily roadway traffic counts conducted in February 2010 for the study area while UCSD and public schools were in session”.

- How many days in February were used?
- What days were studied? There are more students on Tuesday and Thursdays than M/W/F.
- Why is the data so old? 2010 is three years ago?
- Private schools (of which there are several in this area [Montessori, Children’s School, La Jolla Country Day] have a one-week winter holiday in February. Was this taken into consideration?

Page 4.2-3, “LOS A through D are considered acceptable for urbanized areas where further improvement in LOS is not feasible or practical”.

- Table 4.2-1 shows LOS levels of D, E, C, E, D – the volumes are very close to capacity. This does not appear to take into account any growth or future development – such as the Venter Institute currently being built and the proposed 3 additional buildings planned for the site?

Page 4.2-5, “LOS A indicates free flow conditions with little or no delay and LOS F indicates congested conditions with excessive delays and long back-ups.”

- What are the AM and PM peak hours being used?
- Anyone who has driven this area in the morning (7-9am) and in the evenings (5-7pm) knows that there are excessive delays.
- How is it possible that the LOS scores are better during peak hours that overall?

Page 4.2-7, “La Jolla Scenic Drive North – A contiguous sidewalk is provided along the south side of La Jolla Scenic Dr North; however no sidewalk is currently provided along the northerly portion.”

- OMISSION On the north side of La Jolla Scenic Dr North, there is a well-traveled footpath that is used by pedestrians.
LETTER

Page 4.2-3: “There are no local or national established trip generation rates for a facility such as this project. Site-specific data from the existing Hillel Center (both the Chaffee property and the existing on-campus space) indicate many current patrons walk from UCSD...surveys were conducted by the applicant to determine the number of patrons who would walk to the site instead of drive. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated they would walk to the Hillel facility at its proposed location, 20 percent would drive and 5% would carpool.”

- Is a survey conducted by the applicant a fair and independent way to analyze trip generation?
- Of course, the students will say they are going to walk...there is nothing binding them to actually walking – this is a best case scenario!
- For completeness, what is the traffic impact for a worst case scenario – 80% of students drive and 20% walk?

Page 4.2-12: “Access to the vacant site associated with Phase 2 would be provided by a right-in/right-out driveway on La Jolla Scenic Way. Outbound traffic oriented to La Jolla Village Drive would need to make a southbound to northbound U-turn at the intersection of La Jolla Scenic Drive North and Caminito Deseno to reach their destination.”

- La Jolla Scenic Way is how many feet from La Jolla Village Dr to La Jolla Scenic Drive North?
- The right-in/right-out driveway is proposed to be how many feet from the intersection at La Jolla Village Dr.?
- There are 2 left turns from La Jolla Village Dr onto 2 lanes on La Jolla Scenic Way (which becomes one lane after how many feet?). Is this an accurate description – after turning left, a car turning into the project site will slow to make a right turn (after how many feet)?
- Is there a possibility of cars backing up into the intersection as cars wait to turn into the facility?
- Isn’t there a high possible of rear-end collisions since this right-in driveway is so close to the intersection?
- The exist on-site parking spaces will be lost to create this driveway and to provide adequate site distance for turning?
- Wouldn’t it be safer to locate the entrance to the site on La Jolla Scenic Dr North which is further from the La Jolla Village Dr intersection?
- How will you prevent cars from turning left out of the facility? Is there a raised median?
- Given that the closed area is located on the southeast corner, will cars exiting the facility have good sight vision to see cars coming from La Jolla Scenic Dr North?
- Is it possible that cars exiting the facility will choose to turn onto La Jolla Scenic Dr North and U-turn in the driveways to get back to La Jolla Village Dr (providing additional traffic to a narrowed street with no cul-de-sac for turning around)?
- What about the cars exiting the facility that choose to turn onto La Jolla Scenic Dr North to Chaffe Ave and out to Torrey Pines Rd? This will create additional circulation through an already congested neighborhood.
Page 4.2-1620 “the analysis takes into account traffic from any projects anticipated to be operational in the same time frame as the project.”

- What about the impacts of the J. Craig Venter Institute just west of the project site? It is currently under construction?
- How many on-site parking spaces will be lost on Torrey Pines Road due to the Venter Institute?

Page 4.2-33 Parking Demand, “The UCLA Hillel Student Center most closely represents the proposed UCSD facility in terms of its approximate location to the university, surrounding land uses and in activities planned.”

- What is the zoning and immediate surroundings (e.g., next door and across the street) and how far away is student housing for:
  - UCLA Hillel?
  - UCSD Hillel?
  - USD Hillel?
  - Berkeley Hillel?
- I know the Berkeley Hillel is located on Fraternity/Sorority row and is NOT across the street from single-family residences.

Page 4.2-34, “information was collected from Hillel student centers across the country...The average parking rate for California Hillel student centers is 1.9 spaces per 1,000 square feet, and”

- Where is the detail to support this analysis?

Page 4.2-34 Parking Supply, “There are currently seven parking spaces on La Jolla Scenic Drive North...Access to the surface parking lot would be from La Jolla Scenic Way. There are currently three parking spaces in the area that would be lost...”

- INCORRECT – there are far more than 7 parking spaces on La Jolla Scenic Dr North. This street has:
  - 4-5 parking spaces where the cul-de-sac would be removed
  - 20 parking spaces along the north side of La Jolla Scenic Dr N
  - 8 parking spaces along the south side of La Jolla Scenic Dr N
  - When UCSD is in session – both sides of this street are parked...all day long.
- INCORRECT – there are currently 7 parking spaces on La Jolla Scenic Way (along the side where the entrance would be)
- How many parking spaces are being lost on Torrey Pines Road as a result of the Venter Institute?
- How many TOTAL existing parking spaces will be lost in the immediate vicinity due to Venter and the proposed Hillel?
Letter

Page 4-2-35, Significance of Impacts: “Based on the calculated parking need, Phase 1/Phase 2 would provide adequate parking for the facility. Therefore, impacts to parking would be less than significant.”

- INCORRECT: There would be a SIGNIFICANT IMPACT to parking.
- The “calculated parking need” is flawed, based on assumptions and not on the Municipal Code requirements for a religious facility.
- The parking supply is just wrong and does not accurately reflect the parking spaces that will be lost in the immediate vicinity due to ROW vacation, entry on La Jolla Scenic Way and the loss on Torrey Pines Road (due to Vertex).

Appendix B, Traffic Impact Analysis, page 49

“Locating the driveway on La Jolla Scenic Way (as opposed to La Jolla Scenic Drive North) prevents conflicts with driveways serving residences located on La Jolla Scenic Drive North.”

- OMISSION: The EIR fails to address the traffic hazard of locating the project access on La Jolla Scenic Way: “The location of the proposed driveway is approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way signalized intersection.
- The two left turn lanes from La Jolla Village Dr are not going to be expecting cars to slow and turn right into the project site (the already do not expect cars to turn at La Jolla Scenic Dr North). This is an issue that is TOO CLOSE to the intersection.
- La Jolla Scenic Way is a highly trafficked road use by:
  - Residents of La Jolla Highlands
  - Residents of La Jolla Shores (trying to avoid the light at Torrey Pines Road)
  - UCSD students looking for parking
  - Parents going to Torrey Pines Elementary & other private schools
  - People going to the YMCA
  - People going to the two synagogues

- It is possible that drivers could choose to make an illegal southbound to northbound u-turn on La Jolla Scenic Way to La Jolla Scenic Drive North”
  - This is a very real possibility.
  - Omission: EIR fails to address the possibility that drivers may u-turn in the residential driveways along La Jolla Scenic Drive North
  - Omission: EIR fails to address the possibility that drivers may u-turn at Cliffridge Ave (since the project proposes to remove the existing cul-de-sac which is currently used as a turn-around)

- For the safety of everyone, the residents on La Jolla Scenic Drive North (of which I am one) would like a more thorough analysis of the impacts of locating the project access on La Jolla Scenic Drive North – please include.
- Would the applicant consider locating the project access on La Jolla Scenic Dr North?
- OMISSION: Is the elimination of 6-7 on-street parking spaces (along La Jolla Scenic Way) allowed in a parking impact overlay zone?

Response
Appendix B, Traffic Impact Analysis, page 54

"It should be noted that while the UCLA facility is most closely representative of the proposed UCSD site, it is much larger in terms of square footage. Even with the significant increase in size for this center which would allow for a higher attendance at programmed events, parking is apparently a non-issue both for the facility patrons and with the surrounding community residents."

- UCLA Hillel is not similar to this proposed site:
  - It is located in a multiple dwelling zone, not a single-family zone
  - As stated on their website (http://ucla.hillel.edu/home.aspx):
    - "Parking for Hillel at UCLA is located at UCLA’s Lot 2, just south of Hillel on the opposite side of the street. ‘PLEASE NOTE THAT THERE IS NO PARKING AVAILABLE AT HILLEL OR ON THE SURROUNDING NEIGHBORHOOD STREETS’"
    - At the UCSD location – there is NO huge pay for parking lot available to the students. As such, this is a not a valid comparison.
  - Hillel UCSD is located in a high-density, student residential zone with large parking lots on either side of the student center.

Page 55, “Table 15-1, the average parking rate for the similar California University Hillel centers is 1.9 provided spaces per KSF."

- These parking ratios are cherry-picked.
- UCLA should not be included per reasons stated above.
- UCSB is located in what type of zone? Is there a CUP? What is the parking availability other than at the Hillel site?
- CSUN is located in what type of zone? Is there a CUP?
- CSUN provides 40 on-site spaces (not 17) – if Hillel visitors can park in the 40 spaces, then they should all be included in the calculation.
- The Source of this data is the “Project Applicant” – it appears that the applicant has selectively picked with Hillel sites to include in the Parking Rate Summary to get the appropriate average. Did the Traffic Engineer conduct an independent analysis?
- What are the data points for UC Berkeley? UC Santa Cruz? UC Irvine? UC Riverside? And UC Davis?
- The parking study should not only count vehicles parking in the parking lot of the facility, but should also take into account nearby parking lots, streets for vehicles that are utilizing the facility.
4.8.2 NOISE

Page 4.8.5 “Phase 1/Phase 2 would accommodate additional programs and activities in the outdoor gathering areas. On-site noise sources would be those associated with typical student activities at the courtyard and patios. These activities would typically consist of conversations, meetings, and general social gatherings, and are not anticipated to exceed the applicable noise ordinance standards.”

- What exactly will be the impact in noise to the neighbors across the street of a student center with an estimated 200 daily trips per day. There is noise related to:
  - Outdoor gatherings of students
  - People talking to each other and on cell-phones as they come and go from the facility
  - Car alarms being set (beeping) and car alarms going off
  - Increased noise due to cars coming and going

- On the nights when the La Jolla Playhouse has a performance, theatre-goers park on La Jolla Scenic Drive and there is increased noise as these people come and go late at night. They stop and linger – talking to each other and talking on their phones. Instead of this noise only on show nights, this noise will be 6 DAYS A WEEK! This is a SIGNIFICANT INCREASE in noise for the neighboring single-family homes.

4.12 VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER

The student center would result in a direct and significant impact on visual effects and community character because it would cause a substantial alteration in the character of the existing single-family character of the area.

The homes along La Jolla Scenic Drive North have front yard setbacks on about 40 feet. These homes have attached garages of 22 to 24 feet in width that are setback 12 feet to 15 feet from the front property line.

- Hillel is proposing to narrow the existing street – La Jolla Scenic Drive North by 2 feet. Once narrowed, what will be the setback of the Hillel along La Jolla Scenic Drive North?
- Is there a retaining wall along La Jolla Scenic Dr North? If so, how long and how high?
- What will the single-family residences along La Jolla Scenic Drive North see across the street? Will it be in “general conformity with those in the vicinity?”
 Letter

Page 4 12-22, Table 12.1-1

"As shown in this table, many of the nearby existing homes are three-bedroom, two-bath homes with two-car garages on large lots typical of the time. The larger four-bedroom homes have three-car garages. The average building and lot size of the surveyed single-family homes is 2,273 square feet of building on 8,542 square feet of lot. The two-story condominiums and townhome units have shared walls and occur in larger structures composed of two to four units."

- The average single-family home is 2,273 square feet situated on a 8,542 square feet lot.
- hillc is proposing three buildings “clustered” together around an open space.
- Are the three proposed building spread evenly across the site (like the homes are located each in the middle of their lot)?
- Does clustering the building together give the impression of one large building?
- What is the lot size of the entire project site?
- What is the lot size of the parking area?
- What is the lot size where the buildings are clustered together?
- Hillc is proposing a student center that is three buildings, clustered together to appear as one large building that is three times the size of the single-family homes across the street?
- Additionally, the overall use of the buildings is not at all consistent with the use of a single-family home.

Overall the deIR fails to acknowledge significant impacts to land use, transportation/circulation/parking, and visual effects and neighborhood character. Therefore the deIR fails to consider feasible alternatives that eliminate or substantially reduce those impacts.

Sincerely,

[Signature]

La Jolla Scenic Drive North
La Jolla, CA 92037

Response

RTC-819
<table>
<thead>
<tr>
<th>LETTER</th>
<th>RESPONSE</th>
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<tbody>
<tr>
<td><strong>BV-1</strong></td>
<td>The City acknowledges the current and previous comments. The comments are included as part of the record and made available to the decision makers prior to a final decision on the proposed project.</td>
</tr>
<tr>
<td><strong>BV-2</strong></td>
<td>The City as Lead Agency followed all EIR noticing requirements under CEQA Guidelines Section 15087. The Notices of Availability of the EIR were widely distributed to agencies, organizations, and individuals who were known to have an interest in the project. In addition, the notice was published in the <em>San Diego Daily Transcript</em>. The notices included a website indicating where the EIR could be found.</td>
</tr>
<tr>
<td><strong>BV-3</strong></td>
<td>The previous recirculated EIR (January 2013) did not include redlining or underlining, nor did the current recirculated DEIR (December 2013). The Preface to the recirculated EIR in both versions provided an overview of the revisions made to each document. The Preface states:</td>
</tr>
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<td>Section 15088.5(g) of the CEQA Guidelines requires a summary of the revisions made to the previously circulated Draft EIR. The following is a summary of the environmental analysis revisions completed.</td>
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<tr>
<td></td>
<td>Planned development projects within the vicinity of the project site have been added to Chapter 7, Cumulative Impacts. The traffic impact analysis and other environmental issues have been revised as applicable.</td>
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<td></td>
<td>Additional information includes a construction traffic analysis, an updated biological survey, an updated analysis on the potential for on-site generated noise, and further clarification of the Phase 1/Phase 2 project (such as the size of the street vacation, street dedication, easements, and lot coverage).</td>
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<td>Therefore, the recirculated EIR complied with the requirements under CEQA with regards to the recirculation of the EIR.</td>
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<td></td>
<td>There was no intention to confuse or to discourage readers from making cogent comments on the adequacy of the EIR.</td>
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The Preface to the Recirculated Draft EIR, p. 1, states that “Section 15068.8(g) of the CEQA Guidelines requires a summary of the revisions made to the previously circulated Draft EIR” which included: planned development projects within the vicinity have been added...construction traffic analysis, updated biological survey, potential for on-site generated noise, and further clarification of the Phase 1/Phase 2 project.

- Upon my review of the document, there appears to be many edits/updates. The most significant changes appear to be substituting the word “religious” for “student” and “property” for “residence” when referring to the use of the single-family residence currently being used for administrative offices.

- Additionally, it appears that questions asked during the 1st recirculation for been answered – for example, Page 8-3...Hillel is organized as a 501(c)(3) California nonprofit...”

- Is it appropriate under CEQA to make such edits and to respond to some (but not all) of the questions asked during the first recirculation? How will this be handled in the Final EIR? Will the response state “See 2nd recirculated EIR?” Why are these changes not reflected in the Summary of Revisions?

- I note another update to the Project Name: Hillel Center for Jewish Life (previously known as Hillel of San Diego Student Center II and also UCSD Hillel Center for Jewish Life).

- Please provide all the various Project Names associated with Project #212995.

- Why does the name keep changing? I ask because when it was Hillel of San Diego Student Center II – it was going to be a Hillel for ALL the campuses in San Diego. Then the name was changed to UCSD Hillel... because it was going to be the Hillel for UCSD only. Now that the name has changed to Hillel Center for Jewish Life – what population of Jewish students will it be serving – only those at UCSD? Will it be the central Hillel location for all college campuses in San Diego? Please confirm the student population this project intends to serve in the immediate future and in the next 20 years.

As detailed in EIR Section 3.4.2.1, the project would dedicate a 2,183-square-foot area along the northern property frontage along La Jolla Scenic Drive to the public ROW. Figure 3-17 shows the proposed ROW dedication along the northern perimeter of the project site. This area would include a new sidewalk constructed per City standards, native landscaping, and a new bus stop.

The project name was changed to clarify the project as a permanent facility used primarily for religious purposes.

All comment letters associated with each public review version EIR have received responses and are attached to the Final EIR. Where appropriate, reference is made to each version. Any revisions to the Final EIR triggered by the public comments are stated clearly throughout the responses. The Summary of Revisions reflect the most important changes to the document and are not required to detail every clarification. The comment letters and responses to comments are part of the final administrative record and the Final EIR.
The discretionary approvals required for each alternative are as follows:

The Existing with Improvements Alternative would require a SDP for development with the LJSPD for proposed driveway and parking improvements, and a deviation from the maximum paving and hardscape in Residential Zones Requirement.

The No Project Alternative would require no discretionary actions.

The Reduced Project Footprint on Vacant Parcel Alternative would require the same discretionary approvals as the proposed Phase 1/Phase 2 project.

The Site 675 Alternative would require a deviation from development regulations similar to the proposed Phase 1/Phase 2 project.

A description of the No Project Alternative has been revised to clarify that one of two possible outcomes could result under the no project scenario. If the code violation is resolved through the construction of required improvements, the impacts discussed under the Existing with Improvement Alternative would result. If the code violation is not resolved, the Cliffridge house would revert to single-family use as described in the revised portion of Final EIR Section 9.2.2.

Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “...is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center”
as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.
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|        | CEQA Guidelines Section 15126.6 requires a discussion of a reasonable range of 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 (see Chapter 9 of the EIR). Part of the alternatives analysis includes a discussion of alternative locations. CEQA Guidelines Section 15126.6(f)(2)(A) provides that the analysis of alternative locations is to focus on whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Therefore, only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Section 9.1 of the EIR discusses the alternatives of acquiring a different vacant lot in the area, and leasing available/shared space in the neighborhood. Both of these alternative location potentials were determined to be infeasible. No suitable land is available to purchase within walking distance of the UCSD campus. Leasing property does not meet the objective of providing a permanent facility. With regards to locating the project at a synagogue, EIR Section 9.1 states:

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

A single feasible site, Site 675, was determined to be a possible site for the Phase 1/Phase 2 project, and is discussed in detail in Section 9.2.4 of the EIR. This alternative site was rejected because it did not reduce any impacts and would result in greater impacts to biology, greenhouse gas emissions, and hydrology.

Overall, the EIR satisfies CEQA and the requirement for an analysis of a reasonable range of alternatives, including alternative project site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or lessening of any significant impacts of the proposed project, the alternative locations were rejected. |
The EIR provides a reasonable range of alternatives that could feasibly attain most of the basic objectives of the project, but potentially avoid or substantially lessen significant effects of the project.

The explained EIR identified significant (mitigated) impacts associated with biological resources, noise, and paleontological impacts. Each alternative presented an attempt to provide changes to the proposed project which would reduce those identified impacts while still meeting project objectives. For a detailed comparison of the alternatives compared to the proposed project, see EIR Table 9-1.
<table>
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<th>LETTER</th>
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<tr>
<td>BV-12</td>
<td>The Final EIR provides an accurate project description (see Chapter 3) in accordance with the requirements of CEQA Guidelines Section 15124. A detailed description of surrounding land use, including an aerial photo, and neighborhood character is included in Final EIR Section 4.12.1.2.</td>
</tr>
<tr>
<td>BV-13</td>
<td>As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site. The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.</td>
</tr>
<tr>
<td>BV-14</td>
<td>See response to comment BV-13. As described in the project description, Shabbat dinners would be held off-site. A Conditional Use Permit is not required. See response to comment BV-9.</td>
</tr>
</tbody>
</table>
As detailed in EIR Section 3.0, Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices to support the primarily religious use.

See the responses to comments BV-7 and BV-8.

The discretionary approval associated with the Existing with Improvements Alternative is discussed in detail in EIR Section 9.2.1. As stated therein, the Existing with Improvements Alternative would require the following discretionary actions:

- SDP for development within the LJSPD for proposed driveway and parking improvements.

The pending code violation relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support the current use. The code violation is pending. Upon occupation of the new facilities under the Phase 1/Phase 2 project, the temporary use of the Cliffridge property would expire and revert back to single dwelling unit use. To identify subsequent ownership or residents of the Cliffridge property would be speculative and beyond the scope of the requirements of CEQA; however, there is no plan for the Cliffridge property to be used as an extension of the project.

With regards to the cul-de-sac, the ROW vacation would be abandoned to provide landscaping, a pedestrian/cyclist parkway, and park-like amenities, and would not be utilized for parking as detailed in EIR Section 3.4.2.1(f).

With respect to setting a precedent, see response to comment BV-9.

This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

See response to comment BV-17. Upon project approval, adequate parking would be provided to support the new facility.
Pursuant to CEQA, the decision makers would be able to approve one of the proposed alternatives in lieu of the proposed project.

EIR Section 3.3 describes discretionary actions related to the Phase 1/Phase 2 project. Section 9.2.1 discusses the Existing with Improvements Alternative. See response to comment BV-7 for a brief summary.

The second recirculated EIR (December 2013) does not include a Section 3.3.1.3.

EIR Section 3.4.2.1i includes all details relative to the ROW vacation.

The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City's Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

The ROW vacation is part of the project description and would be required for project implementation.

EIR Section 2.5.4.4 notes that the project site is located within the Parking Impact Overlay Zone, including campus areas.

The Venter Institute did not remove any parking spaces from La Jolla Scenic Drive North.

Parking spaces are counted the same for the purposes of environmental analysis. Parking limits are acknowledged, but are not relevant to the analysis in the EIR.
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<tr>
<td>BV-24d</td>
<td>The construction of the project driveway on La Jolla Scenic Way would result in a loss of three parking spaces, an additional three parking spaces would be lost in order to meet stopping sight distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street vacation of the La Jolla Scenic Drive (N) cul-de-sac would result in a net loss of six parking spaces. Overall, implementation of the project would result in the loss of a total of twelve on-street parking spaces, three more than what was contemplated in the recirculated EIR (December 2013) See EIR Section 4.2.4.1(a). It is concluded that the loss of three additional spaces would not constitute a significant impact. Impacts to parking would be less than significant as discussed in the EIR.</td>
</tr>
<tr>
<td>BV-24e</td>
<td>EIR Section 4.2.5 addresses potential traffic hazards surrounding the project site. No blind corners were identified in the traffic analysis and adequate sight distance would be provided at the project driveway onto La Jolla Scenic Way.</td>
</tr>
<tr>
<td>BV-24f</td>
<td>EIR Section 4.2.3.1 addresses traffic on La Jolla Village Drive North in the existing condition, the near-term with project traffic and cumulative (horizon year) condition. Cut-through traffic is accounted for in trip counts on this roadway.</td>
</tr>
<tr>
<td>BV-24g</td>
<td>EIR Section 4.2.4.1a describes the existing conditions relative to parking surrounding the project site. Please refer to the response under letter d. above.</td>
</tr>
<tr>
<td>BV-24h</td>
<td>The EIR states that the roadway is classified as a 2-Lane Collector in the La Jolla Community Plan. Along the southern frontage of the project site, it is a local roadway. The characteristics of the road described above are included in the EIR.</td>
</tr>
</tbody>
</table>
LETTER

This is an introduction to the following.

5,291 is the gross ground floor area; only ground floor area is used in calculating lot coverage.

Lot coverage without ROW vacation is 34.5 percent (5,291 square feet/15,350 square feet)

Lot coverage (with ROW vacation and dedication less landscaping) = 5,291/23,541 = 22.5 percent

As indicated in EIR Table 4.12-1, the average home size in the vicinity is 2,335; the average lot size is 8,267. Many of those homes are single story; although some are two-story homes. Lot coverage would therefore vary depending on the square footage of the ground floor. Bulk and scale compatibility is adequately analyzed in EIR Section 4.12.

Professional offices are not an allowed use within the zone. See response to comment BV-9.

The Existing with Improvements Alternative would require a deviation to provide six on-site parking.

EIR Section 9.2.1 explains that the Existing with Improvements Alternative would include demolishing the existing attached garage, patio, and a tree in order to construct a paved surface parking lot with six standard parking spaces.

RESPONSE
The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). See EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

The UCSD Long-Range Development Plan (2004) includes a development “allowance” on each site, which is in turn used to project potential future traffic volumes. Those volumes are included in the SANDAG traffic model, which was used in the traffic impact analysis for the project. Therefore, the maximum development potential of that and other UCSD properties were included in the cumulative traffic analysis.

a. The Venter Institute is the only project that was approved for the site. No other projects for that site were specifically contemplated at the time of the preparation of the EIR.

b and c. With regards to access to and from the Venter Institute, EIR Section 4.2.3.1 (a) states:

The Venter Institute has revised the site plan to only provide access to Expedition Way (full access driveway). Access to Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project is approved, and is currently under construction. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2(a), specifically EIR Figures 4.2-8 and 4.2-9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

The vehicle access scenarios set forth by the commenter are speculative. The Venter Institute’s traffic impacts were analyzed in the IS/MND for the project, which were in turn accounted for in the recirculated DEIR.
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<td>BV-28</td>
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<td></td>
<td>This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. See response to comment BV-23.</td>
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<tr>
<td></td>
<td>BV-29</td>
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<tr>
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<td>This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.</td>
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</tbody>
</table>
**LETTER**

**BV-30**
Page 4.1-9 "the existing Cliffridge house is 1,792 square feet (GFA) ... six parking spaces would be required."

- Does the 1,792 square feet include or exclude the garage that has been converted to a room?
- Does the Existing with Improvements Option allow for the garage to stay as is (converted to a room) or something else?
- Will the backyard and converted garage be eliminated and replaced by a parking lot?
- What is the impact to the neighbor to the south of these house? Noise coming from cars and people coming and going to their cars?
- Isn’t very unusual to live next to a residential home that has no backyard, but instead a parking lot?

**BV-31**
Page 4.1-14 Siting of Buildings: "As shown on Figure 4.1-1, the four-foot side year setback would be adhered to at the northern frontage of the site."

- The DEIR fails to provide the reader with an accurate description of La Jolla Scenic Dr. North. For the homes directly across the street on La Jolla Scenic Drive North – this is the FRONT of the homes, not the SIDE. The setback is generally 20 feet from street to the garage and then the house is set back from the garage another 20 feet.
- What is the setback to the actual HOMES, not the garages (as the bulk & scale of the property is in the HOUSE, not the garage)?
- When you drive down La Jolla Scenic Dr North – the homes on the north side of the street will be setback 20 feet and 40 feet, but the HCL on the north side of the street will only be set back 4 feet... is this a correct statement?
- Is this in “general conformity to other neighboring building setbacks”?
- So instead of homes facing each other on this residential street – it will be homes facing the side of three buildings clustered together which appear three times as large?
- The DEIR states the AVERAGE setbacks of the neighbors is approximately 9 feet? How exactly is this average calculated? Which homes are included to determine this average.

**BV-32a**
Page 4.1-19 Compatibility with Surrounding Land Use

The DEIR fails to provide a thorough and accurate description of the surrounding land uses.

- The detached, single-family residences, mostly one-story built on the south side of La Jolla Scenic Drive North and the most significant land use comparison. These are approximately 2,000 square foot homes on approximately 10,000 square foot lots. They are set back 20 feet to the garage and another 20 feet from the garage to the front door.

**RESPONSE**

**BV-30**
The Cliffridge house itself is approximately 1,792 square feet and the garage is an additional 495 square feet.

With respect to the demolition of the garage, see response to comment BV-26(c).

The Existing with Improvements Alternative would provide six standard parking spaces (one as handicap-accessible) in a new surface parking lot with a new driveway connecting to the existing cul-de-sac. Operational and construction-related on-site noise impacts would be less than significant.

The remainder of this comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

**BV-31**
As shown in EIR Figure 4.1-1, the approximate 10-foot setback of the project from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet. The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

Municipal Code Section 113.0252 is entitled “Measuring Setbacks” and is excerpted below.

(a) The distance of the setback is measured inward from and perpendicular to the nearest property line, as follows, except as otherwise indicated in Section 113.0246(e) and (f):

(b) Those portions of underground parking structures, first stories, and basements that are above grade are subject to setback requirements.
Setbacks are measured from the nearest point of a structure. Thus, the setback average of 9 feet detailed in the EIR is correct.

With respect to consistency with neighborhood character, the recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

With respect to the project’s consistency with setbacks and neighborhood character, see response to comment BV-31.
The proposed project would generate a greater amount of trips than a single-family residence. However, even under the proposed project worst case scenario of 200 trips per day, no significant impact associated with traffic would occur. See Section 4.2 for details of the traffic analysis. The comment related to the interior of single-family residences does not raise an issue associated with the adequacy or accuracy of the EIR. No further response is required.

With respect to the loss of parking related to the project, see response to comment BV-24d.

The project is located within the Campus Parking Overlay Zone, see response to comment BV-24a.

With respect to narrowing the street, see response to comment BV-23.

A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making an westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb will be provided to the north of the proposed driveway. Therefore, the traffic safety impacts were found to be less than significant.

Currently, vehicles may use the La Jolla Scenic Drive North cul-de-sac as a turnaround area.
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| **BV-36a**  
On-Site Generated Noise – page 4.8.5 “a typical Hillel program would draw between 10, and at most, 50 students to this site”  
* What is the maximum capacity? Noise levels should be analyzed using the actual capacity and not some arbitrary expected number of students.  
* There is nothing in place that would limit the number of students on-site at any one time?  
* How many students typically attend Shabbat services which are not currently scheduled at this location, but may very likely occur in the future?  
* 50 people would attenuate to 43.4 dBA (which is VERY CLOSE to the noise ordinance limits of 50 and 45 dBA). What would the levels be for 75 people? 100 people? 150 people? 200 people? | **BV-36a**  
With respect to maximum capacity, see response to comment BV-13. There is no intention for future Shabbat dinners to be held on-site. The noise analysis is based on the occupancy numbers as reasonably anticipated for the foreseeable events. |
| **BV-37**  
HVAC required for heating and cooling  
* Are the mechanical equipment being considered similar in size and sound to those that would be used in a single-family residence?  
Table 4.12-1 including the single-family attached homes to the east artificially increases the Average Building SF from 2,273 to 2,335 and decreases the Average Lot SF from 8,542 to 8,267.  
* This table should show the averages with and without the attached homes to the east since these are “approximately 4 to 12 feet below grade” and not really visible when determining how it will fit in with the surrounding neighborhood.  
* Similarly, it is misleading to include the size/capacity of the La Jolla Playhouse since these buildings are setback from the street and hidden by dense trees and other vegetation. These are not really visible when considering the bulk and scale of the applicable neighborhood. | **BV-37**  
According to Section 4.8.3.2, the HVAC units require a capacity of 1 ton for 1,000 square feet of building space, it was conservatively calculated that a 5-ton unit would be required for each of the three buildings.  
**BV-38**  
The homes used in the analysis are the 13 in closest proximity to the project site. Only one single-family attached unit was included.  
With regards to the La Jolla Playhouse, this is not part of the bulk and scale survey that compares uses immediately surrounding the project site. |
| **BV-39**  
Page 4.12-23 - Inaccuracy “the larger four-bedroom homes have three-car garages”  
* The ONLY house on Table 4.12-1 that has a three-car garage is #7. All the other 4 bedroom homes have two car garages. | **BV-39**  
This issue has been clarified in the Final EIR. |
**LETTER**

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<th>BV-42</th>
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| **Page 4.12-23** - "Individual structures with an overall building net square footage of 5,772 square feet:
- Why is NET square footage used here as opposed to GFA?
- Isn’t GFA a better measure to use when looking at bulk & scale?
- How is 5,772 calculated?
- The buildings are 3,298 NET + 984 NET + 1,181 NET = 6,095 total. What is the 5,772?
- What are the correct square footage calculations? Can you please apply them throughout the entire EIR? |
| Three structures are clustered together APPEAR as one large 7,085 square foot structure on a 15,530 square foot lot or 49% coverage (without ROW).
- The single-family detached homes directly across La Jolla Scenic Dr North approx. 2,200 square foot homes set in the middle of an approx. 8,500 square foot lot or 26% lot coverage.
- How much larger is 7,085 square feet than 2,200 square feet?
- This building (or cluster of buildings) is so substantially out of character with the surrounding homes, it is laughable. MISSING - the DEIR fails to provide any pictures of the surrounding homes so that the decision makers can do a visual comparison. |
| **Traffic Analysis**

**Site Access** - Access to and from the facility will be provided via a single right-in/right-out driveway onto La Jolla Scenic Way.
- OMISSION - the traffic analysis fails to provide any analysis of locating the Site Access on La Jolla Scenic Way. It doesn’t even describe the traffic flow here.
- OMISSION - the traffic analysis fails to consider locating the site access on La Jolla Scenic Dr North which would be safer.
- Two left hand turn lanes turn from La Jolla Village Dr onto La Jolla Scenic Way - where there are two lanes for approximately 50 feet and then they rejoin into one lane.
- This is a high traffic street – it is used by -
  - Local residents who live here
  - Parents of children at Torrey Pines Elementary School
  - Members of the La Jolla YMCA
  - Members of the two synagogues and one church
  - UCSD students looking for free parking |
| **RESPONSE**

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| Net square footage is most commonly used to describe properties. The 5,722 net square feet includes all usable space within the structure. The correct square footages for the project are used consistently throughout the EIR and are as follows:
- 5,722 net square feet
- 6,479 gross square foot floor area (without phantom floor)
- 7,084 gross square foot floor area (with phantom floor) |
| The project was specifically designed to appear as three individual structures in order to be consistent with the neighborhood character. See response to comment BV-31. The EIR includes numerous figures showing visual simulations of the proposed project. |
| With respect to sight distance from the project driveway, see response to comment BV-34. Access to the project is provided on La Jolla Scenic Way, rather than La Jolla Scenic Drive North, to prevent conflicts with driveways serving residences located on La Jolla Scenic Drive North. An analysis was conducted of the proposed driveway location, and found traffic safety hazards to be less than significant. Existing traffic conditions are described in EIR Section 4.2.1.1 and the traffic hazards are addressed in EIR Section 4.2.5. A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway. |
LETTER

- Residents of La Jolla Shores who "cut-through" the neighborhood in order to avoid the signal at Torrey Pines Road.
- Locating the site access here is extremely dangerous as it will:
  - Create more chaos as cars are trying to merge from two lanes to one.
  - Cars will not anticipate cars slowing to go into a driveway.
  - Cars will back-up onto La Jolla Village Dr.

La Jolla Scenic Dr North:

- OMISSION – the traffic analysis fails to address the unique street with dangerous corners:
  - Turning from La Jolla Scenic Way onto La Jolla Scenic Dr N.
  - Turning from Cliffrgbide Ave onto La Jolla Scenic Dr N.

Overall the dEIR fails to acknowledge significant impacts to land use, transportation/circulation/parking, and visual effects and neighborhood character. The traffic analysis fails to analyze the safety of locating the site access on La Jolla Scenic Way or to consider locating the access from La Jolla Scenic Dr North. The traffic analysis fails to discuss the unusual blind corners on La Jolla Scenic Dr N and the potential safety concerns with narrowing a highly trafficked residential street. Therefore the dEIR fails to consider feasible alternatives that eliminate or substantially reduce those impacts.

Sincerely,

K. Rebeltz
La Jolla Scenic Drive North
La Jolla, CA 92037

2/11/14

RESPONSE

BV-43

The comment is a summary of the previous comments that were responded to above.
LETTER

From: Judy [judy.shufro@gmail.com]
Sent: Wednesday, January 09, 2013 3:32 PM
To: ODO SAS
Subject: site 653ikel

To whom it may concern:

How many times do we need to repeat NO to the hillside project.

Inadequate parking

Inadequate street access

Inappropriate fit in our residential neighborhood

Increased noise level in the evenings

Increased college population without appropriate adult supervision. Please deny this project and stop initiating it over and over again without acceptable safe parameters.

Thank you,
Judy Shufro

For my web site click below:
judithshufro.com

RESPONSE

BW-1 Parking is discussed in EIR Section 4.2.4. Parking impacts were found to be less than significant.

BW-2 Site access is described and analyzed in EIR Section 4.2.5.1. No hazards related to site access were identified.

BW-3 Neighborhood character was analyzed in EIR Section 4.12. Impacts were found to be less than significant. Additionally, the project entails a facility that would be used primarily for religious purposes, which is an allowable use in the Single-Family Zone. See EIR Section 4.1.4.1.

BW-4 EIR Section 4.8.3 analyzed on-site noise generated from the project. Ambient noise increases were found to be less than significant.

BW-5 This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.
BX-1 This comment is an introduction to comments that follow. It does not raise any substantive issues related to the content or adequacy or accuracy of the EIR. No further response is required.

BX-2 The comment expresses the opinions of the commentator and continues to provide introductory statements. It does not raise any substantive issues related to the content or adequacy or accuracy of the EIR. No further response is required.

BX-3 Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose "... is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “churches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.
As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.

Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.
In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project’s potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

With respect to the project as an allowable use at this location, see response to comment BX-2.

With respect to precedent setting, see response to comment BX-8.

With respect to required parking, see response to comment BX-7.
With respect to the proposed width of La Jolla Scenic Drive, the proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

With respect to the safety of the roadway curves, a project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.

As detailed in DEIR Section 4.2.5.1(a), vehicles may currently use the La Jolla Scenic Drive North cul-de-sac as a turnaround area. As shown in Figure 4.2-2 during the AM peak hour (highest hour between 7-9 a.m.), no vehicles turned into the cul-de-sac from La Jolla Scenic Drive North, and only two vehicles turned into the cul-de-sac from Cliffridge Avenue. Only seven vehicles turned into the cul-de-sac during the PM peak hour (highest hour between 4-6 p.m.).

Phase 1/Phase 2 would vacate the westerly cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. The vacation of the street right-of-way and street reconfiguration will provide pedestrian improvements at this location.
BX-12 The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included as part of the final resolution of approval and subject to the determination of the City Council.

BX-13 The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.
BX-14

Thank you for your personal patience and professionalism in this matter. Thank you for noting these inaccuracies and omissions in the RDEIR 2. The violations of the Municipal Code and La Jolla Shores Planned District Ordinance should be noted so that the San Diego Planning Commission and the San Diego City Council can understand clearly that denial of the project is uniquely the valid decision.

Yours truly,
Ross M. Starr

February 1, 2014

RESPONSE

BX-14

The comment reflects the opinion of the commenter, and is a conclusion to the previous comments responded to above. No further response is required.
Appendix 1 – Mission Statements of National Hillel and of Hillel of San Diego

Mission statement of National Hillel taken from its website (https://www.hillel.org/about) on December 11, 2013:

Hillel is the only Jewish college organization large enough to engage the majority of Jewish students.

Hillel welcomes students of all backgrounds and fosters an enduring commitment to Jewish life, learning, and Israel. As the largest Jewish student organization in the world, Hillel builds connections with emerging adults at more than 550 colleges and universities, and inspires them to direct their own path. During their formative college years, students are challenged to explore, experience, and create vibrant Jewish lives.

94% of the students we impact say being Jewish will continue to be important to them after graduation.
(Hits Our Impact)

For nearly a century, Hillel’s network of dedicated student leaders, professionals and volunteers have encouraged generations of young adults to celebrate Jewish learning and living, pursue social justice (Tikvah alum and teudah) and connect to their peers and the global Jewish people. By participating in life-changing trips and campus initiatives, students learn to make a meaningful impact on the future of the Jewish people and the world while they grow intellectually, socially, and spiritually. At the heart of the Hillel network is the Charles and Lynn Schusterman International Center, supporting local Hillels to ensure that we achieve our mission “to enrich the lives of Jewish students so they may enrich the Jewish people and the world.”

Hillel engages with and inspires the leadership of more Jewish college students than all other endeavors combined. We know that 90% of Jews in the United States go to college, and with a rich and diverse Hillel network, we are proud to be serving them at more than 550 colleges and universities.

February 1, 2014
Our Mission: Enriching the lives of Jewish students so that they may enrich the Jewish people and the world.

Our Vision: We envision a world where every student is inspired to make an enduring commitment to Jewish life, learning and Israel.”

Mission statement of Hillel of San Diego taken from its website (http://www.hillelsd.org/mission.html) on December 11, 2013:

“Hillel of San Diego Mission Statement

To be a vibrant Jewish campus presence and to involve the maximum number of university-age Jews in ways that foster a lasting commitment to Jewish life.

To further this mission, we commit ourselves to the following goals:

- Serving the needs of individual Jewish students
- Creatively engaging and empowering Jewish students through personal interactions and compelling programs
- Building a strong sense of belonging and Jewish identity
- Nurturing intellectual and spiritual growth in a pluralistic community
- Advocating for Jewish student needs on campus and in the community
- Linking the campus community to the larger Jewish community, locally and globally.
- Helping students cultivate a closer connection to Israel.
- Developing a campus and organizational culture in which the quality of the relationships attracts involvement.”

February 1, 2014
Appendix 2: La Jolla Scenic Dr. with blind intersections at La Jolla Scenic Way and at Cliffridge Ave. --- a traffic hazard with a narrowed street.
Appendix 3:

UCSD SCRIPPS UPPER MESA
NEIGHBORHOOD PLANNING STUDY ---
Excerpt presented here from the UCSD website
( http://physicalplanning.ucsd.edu/plans/docs/SUMPS_PlanElements.pdf )
downloaded January 26, 2014: following pages

February 1, 2014
V. PLAN ELEMENTS

The plan elements for this neighborhood are backed up by the planning principles reinforced by design guidelines. The three elements are as described below.

A. Open Space and Landscape

1. Belvedere Terrace

The key to creating a special sense of place in this neighborhood is the way in which landscape interface is developed at the edge of the Belvedere. The Belvedere should feel like a neighborhood porch which overlooks the Salkan Canyon Ecological Reserve, lower SIO, and La Jolla Cove. The Belvedere is the public component which includes the tiered walkway and the terraces and walls which extend from it to the common open space. The characteristics are defined as follows:

- Distinct edge creates grade change with a wall or bluffs like edge between the building level (the discrete landscape and the Reserve).
- Create a continuous tiered walkway linking all the four buildings. Diagrammatically, the pathway is a semicircle but can be adapted to and transformed while retaining continuity.
- Uses for Belvedere incorporate both interior or “common” facilities such as conference rooms on a café and outdoor seating area into the edge. Allow the tiered walkway to connect these facilities.
- Relationship to Reserve: the Belvedere foreground will blend into the character of the native landscape in the canyon.

2. External Edges

The landscape of each edge provides for both visual character and functional considerations.

- Torrey Pines Road: the east edge of the site has a relatively narrow setback and includes parking. The existing Torrey pines are to be retained and added to on a slope between the road and parking.
- Norm Torrey Pines Road: the area between North Torrey Pines Road and buildings functions as an extension of the eucalyptus grove from the West Campus and an entry to the neighborhood. Buildings have a greater setback from the road than on Torrey Pines Road to create and reflect the character of eucalyptus grove extending part way down.

Alder Naveh Berke and Associates & Spitalnik Posen
Edge samples:

Expedition Way, and then planting changes past the buildings to low growing coastal sage scrub. The driveway follows Expedition Way along the west edge of the neighborhood.

- Allen Field: the south edge of the site is an important view edge from the buildings. Landscape can be similar to Torrey Pines Road.
- In order to create the appropriate landscaped edges in the parking, the landscape setbacks are 10'-0" from Expedition Way, 60'-0" from North Torrey Pines Road, 22'-0" from Torrey Pines Road, and 10'-0" from Allen Field. A 75'-0" setback for fire protection is required from the planted edge of the Reserve.

3. Discrete Landscapes:

These landscapes can each be unique and also have some of the character of courtyard spaces within the established parts of SIO. Many of the courts and yard areas have almost a residential scale and intimate outdoor gathering or contemplation of the view.

4. View Corridor:

The view corridor plays a critical landscape role; it separates the Torrey pine landscape from the West Campus eucalyptus grove and it provides a topographic connection like a small canyon from the campus and out into the Reserve.

B. Building Parcels / Phasing:

The buildings parcels are defined as buildable areas set between the parking and service road and the forest open space. The Belvedere edge
and the terraces are included in the parcel. The boundaries of each parcel are further defined by pedestrian routes into the site and by the view corridor from the theatre district. The parcels are defined as follows:

Parcel #1: The western edge is defined by the setback to the Reserve and Moomba. The eastern edge is defined by the pedestrian link to the corner of Expedition Way and North Torrey Pines Road.

Parcel #2: The northwest edge is defined by the pedestrian link to the corner of Expedition Way and North Torrey Pines Road and the southeast edge is defined by the view corridor and service yard.

Parcel #3: The north edge is defined by the pedestrian link to the corner of North Torrey Pines Road and Torrey Pines Road. The south edge is defined by the service yard.

Parcel #4: The northeast edge is defined by the service yard of Parcel #3 and the west edge is defined by the setback from the Reserve.

Parcels #1 and #4 could be combined or the boundary line between the parcels changed to suit program needs.

Phasing of development would logically proceed by building from Parcel #1 in sequence through Parcel #4. Parcel #1 has the highest image to Scripps and West Campus and should be reserved for a suitable program in this location. Phasing may be dependent on the utility infrastructure and could theoretically develop in the reverse sequence.

C. Circulation and Parking

1. Vehicular Circulation

Site access will occur at Expedition Way south of the central planted median. The second connection point will be Torrey Pines Road at the south end of the site with a right-hand-turn-in and out. Individual vehicular circulation links these two points with parking and roadways running parallel to North Torrey Pines Road and Torrey Pines Road.

2. Parking

Parking occurs at 90° to the main circulation, broken up with planting and sidewalks to demarcate crossing points. The parking is a few feet lower than the surrounding roads. A short spur road runs parallel to Allen Field. One hundred and seventy parking spaces are planned.
3. Service Yards

Individual service yards are accessed directly from the loop road and spine. These will be precisely configured in relation to each building program but will be screened from view on all sides.

4. Pedestrian Access

There are two main pedestrian paths connecting the West Campus and the site, the Grove Path, and the Ravine Path.

- The Grove Path starts at the intersection of Expedition Way and North Torrey Pines Road, passes diagonally through the eucalyptus grove, and links to the sidewalk and the Belvedere terraces.

- The Ravine Path starts at the intersection of North Torrey Pines Road and Torrey Pines Road where the gap between the eucalyptus and Torrey pine trees allows for a new corridor. The path leads to the sidewalk and the Belvedere terraces. A ramped pathway leading to the Reserve extends the view corridor.

- From the SlO campus, west of the site, the Meander path links to the ealixed Belvedere walkway.

There are two major paths connecting the buildings on the site: a continuous sidewalk between the parking lot and the buildings, and a trellised walkway.

- The trellised walkway, depicted diagrammatically as semicircular, will vary in width and configuration but will allow clear unobstructed passage from one end of the site to the other.

- All main building entries are to allow for through passage from the sidewalk to the courtyard spaces flanking the continuous trellised walkway.
Dear Ms. Nguyen,

Thank you for giving us the opportunity to examine the second recirculated Draft EIR (DEIR) for the proposed UCSD Hillel Center for Jewish Life (Project No. 212995) and respond to it. My family and I reside immediately next to the proposed project site, and therefore consider ourselves to be well informed about the potential impacts of the proposed project (hereafter referred to as the Project).

To our great dismay, we have found that the second recirculated Draft EIR (DEIR) includes no changes/edits/ammendments (at all) that addresses any of our previous comments regarding the adequacy of the DEIR and the inappropriateness of building the proposed UCSD Hillel Center for Jewish Life in the project site. As before, your impression was that the DEIR was designed to confuse rather than to guide; it is not an objective document but a biased one that promotes the specific merits of Hillel rather than discussing the true environmental impacts in a sound and scientific manner. The primary changes in the second recirculation are minor edits that emphasize the student-centered nature of the project and present it as one of a primarily religious nature. This is not only a blatant misrepresentation that is equivalent to concealment of facts, but shows complete disregard for comments made on the first recirculated draft.

Importantly, again, we find that this draft again contains several inaccuracies, omissions, and other misleading statements. Therefore, it does not convey the true environmental impacts of the proposed project.

1) The misrepresentation of the character of the project: In the DEIR, the Project is continually misrepresented as being equivalent to "churches, temples, or buildings of a permanent nature, used primarily for religious purposes". However, the project is in fact a Student Center, which is primarily intended to serve the students of UCSD. This is clearly stated in the mission statement of Hillel of San Diego and of UCSD, which lists, among others, the following primary objective of the project: "Hillel welcomes students of all backgrounds and fosters an enduring commitment to Jewish life, learning and Israel. As the largest Jewish student organization in the world, Hillel builds connections with emerging adults at more than 550 colleges and universities, and inspires them to direct their own paths. During their formative college years, students are challenged to explore, experience, and create vibrant Jewish lives."

Hillel was incorporated in the state of California on July 1, 1992, "exclusively for religious purposes" under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel's specific purpose "...is to provide for the religious needs of Jewish students on the university campuses in San Diego County."

As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a "student center" as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a "building[s] of a permanent nature, used primarily for religious purposes" the project would be a permitted use within the residential zone in accordance with the City Municipal Code.
Section 6.3 of the recirculated EIR was updated (December 2013) to revise information pertaining to the project's potential for precedent setting. As stated therein, precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop. The proposed project does not include any of the aforementioned actions. Based on the proposed uses of the facility (see response to comment F-1), it is allowed under the existing general plan and zoning designations. The project is not proposing an administrative office as the primary use of the project site. The project represents a religious use which, like other churches, temples and places of worship, would inherently include some administrative needs accessory to the religious function.

While there is a potential for other UCSD organizations to seek off-campus facilities in the project area, they would be required to adhere to the permitting and environmental process on an individual and project by project basis. The Cliffridge property is currently used in a similar capacity as the uses proposed in the Phase 1/Phase 2 project description. As stated in Chapter 3 of the EIR, “Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.” As discussed above, this is an allowable use in the zone and does not set a precedent or has resulted in the development of surrounding properties for similar uses, absent individual permitting and environmental review. It is noted that under the proposed Phase 1/Phase 2 project, the existing use of the Cliffridge property would terminate and the site would revert back to a single dwelling unit use.

As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors.
to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

EIR Section 4.1.4.1(a) also analyzes the Phase 1/Phase 2 project in relation to the setbacks of other buildings in the vicinity. As shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

As shown in EIR Figure 3-10, the project site would be adequately buffered from the adjacent neighborhood through landscaping features.

The mechanism to enforce the level of activity and attendance numbers is through the conditions of approval of the Site Development Permit.

The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project's consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.
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<td>which would have an immense impact on the quiet residential neighborhood through noise pollution, foot and car traffic.</td>
<td>See response to comment BY-4.</td>
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<tr>
<td><strong>BY-5</strong></td>
<td>Potential impacts associated with traffic, noise, and lighting were all analyzed in the EIR and determined to be less than significant.</td>
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<td>4) Operation hours are incommensurate with the single-family nature of the neighborhood. It is stated in Section 3.4.2.1.a, that “Hillel regular hours of operation would be between Monday through Friday, 9:00 A.M. to 10:00 P.M., but generally the facility would only be open during the evenings and on weekends if there is an activity planned at such times. Most activities would not occur during the typical A.M. and P.M. peak hours (i.e., 7:00 A.M. to 9:00 A.M. and 4:00 P.M. to 6:00 P.M.).” First, contemplation and expectation of hours of operation without of enforcement does not constitute reality. The possibility exists that there could be events in the proposed facility with large attendances (anywhere between 30 to over 200, see item 3 above) on a Friday or a weekend evening, leading to a gross disturbance of the single-family neighborhood through noise and light pollution, and human and vehicular traffic.</td>
<td>With respect to parking numbers, Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.</td>
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<td><strong>BY-6</strong></td>
<td>As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.</td>
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<td>5) Inadequacy of Parking and Inaccurate Assessment of Potential Parking/Traffic Impact: As noted in item 1 above, the Project is a first and foremost a student center, which is semantically misconstrued as a place used primarily for religious purposes. However, even if it were primarily a religious building, the LBSD ordinance and the Municipal Code require that it provide 1 parking space per 3 seats or 30 spaces per 1,000 square feet of assembly area. In the proposed Project, 27 parking spaces are proposed. The total building area in the Project is over 7000 square feet, which would require nearly 200 parking spaces, 8 times as many as planned. On this point, see the following statement from section 4.2.4.1: “Although the Phase 1/Phase 2 project would be used for religious purposes, it is not a church or place of religious assembly as defined in the Municipal Code (i.e., there are no pews or permanent seats for services; see Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses). Under such circumstances, the City and industry standard is to estimate parking demand based on information for existing comparable facilities. Therefore, data for existing Hillel facilities throughout California were used to estimate the parking supply needed to adequately serve the patrons and staff of the facility.” What the ordinances of communities where other California Hillel centers are located are irrelevant. It is the LBSD ordinance and the Municipal Code in this location that matter.</td>
<td></td>
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<td><strong>BY-7</strong></td>
<td>Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would</td>
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RTC-859
drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 cars). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.

BY-7 See response to comment BY-6.
With respect to the proposed narrowing of La Jolla Scenic Drive, the proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

Note that the pedestrian walkway, open to bicyclists and skateboarders) would be improved from the existing unimproved footpath to a paved sidewalk.

The Existing with Improvements Alternative involves the permanent use of the Cliffridge property primarily for religious purposes which are allowed within the zone.

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.
February 11, 2014

Dear Ms. Shearer-Nguyen:

Thank you for providing the opportunity to comment on the recirculated draft Environmental Impact Report for the proposed Hillel Center for Jewish Life.

As the preface to this recirculated EIR indicated that revisions to the previous draft were limited to the areas of traffic, biology, and noise, I anticipated that a limited response would be sufficient. It was with dismay that I realized that the new document includes many more changes and that such a narrow focus would be inadequate. I have addressed some comments regarding the recirculated draft EIR document as a whole at the end of my comments.

Given the greatly revised nature of the rEIR, my comments are made without reference to issues I have previously raised. I apologize in advance for any duplication this might generate. Passages are denoted by Page Number and Paragraph, with observations and questions denoted by bullet points and numbers, respectively.

Sincerely,

Alex Varon

This comment is an introduction to comments that follow. No further response is required.
### LETTER

**BZ-2**

1. The project site includes two parcels: a 0.2-acre parcel (Assessor's Parcel No. [APN] 344-120-4300) at 8979 Cliffridge Avenue (Cliffridge property), and a 0.8-acre vacant lot (APN 344-120-430U).
   - APN 344-120-4300 is described as a vacant lot; please indicate that the Cliffridge property is an existing single-family residence.
   - Section 3.4.2.1 describes the existing lot: comprising 15,350 square feet without the street dedication and ROW vacation. Assuming that the street dedication comes entirely from the original parcel (as appears to be the case in Figure 3-17), this should make the actual area of the existing lot approximately 17,533 square feet. Is this correct?
   - By my calculation, the figure translates to approximately 0.4 acres. Is this correct?
   - 1 acre = 43,560 sq ft ([source: Wikipedia](http://en.wikipedia.org/wiki/Acre))
   - 17,533 sq ft / 43,560 sq ft = 0.4025
   - What is the size of APN 344-120-4300 as legally described in the deed or County records?
   - Why does the above sentence not use either the legally-defined area or the approximate figure calculated in Question 2?

**BZ-3**

"The site is bounded to the north by La Jolla Village Drive, to the east by La Jolla Scenic Way, and to the south by La Jolla Scenic Drive."

**BZ-4**

"Hillel of San Diego (Hillel) currently uses the Cliffridge property for administrative offices and one-on-one counseling and meetings with students, but requires additional space for religious programs."

1. Since religious programs are not offered at the Cliffridge property, would it be fair to characterize the applicant's use of the property as strictly administrative offices?
2. Is administrative office use allowed under the current zoning for this property?
3. Please list the differences between an administrative office that is used for religious purposes and an administrative office that is used for other purposes.
4. Are there any differences in the impacts between an administrative office used for religious purposes and any other administrative office?
5. Is the current use properly permitted?
6. How long has the applicant used the Cliffridge property in this way?

**BZ-5**

"Permanent use of this facility would require on-site parking."

1. Why hasn't on-site parking been required before?

**BZ-6**

1. Paragraph 3: "Upon occupancy of the HCL, the temporary use of the Cliffridge property would cease and the property would revert to a single dwelling unit use."
   - How can a property "revert" to a use from which it had never properly changed?

### RESPONSE

**BZ-2**

The Cliffridge property in question is a single-family dwelling unit, currently used by Hillel primarily for religious purposes.

1. The vacant parcel with the ROW is 33,541 square feet. Net of the ROW, the parcel is 15,350 sf.
2. The parcel size net of the ROW is 15,350 square feet or 0.35-acre.
3. The parcel is approximately 0.8 acre or 33,541 square feet, of which 18,191 square feet is dedicated right-of-way. Net available acreage for development would therefore be 15,350 square feet.
4. The EIR accurately summarizes the size of the vacant parcel.
5. APN 344-120-4300 includes the dedicated ROW. As stated in EIR Section 3.6, Site 653 along with the vacated ROW was sold by the City to Hillel in 2006 pursuant to City Council Resolution R-301433.

6. It is unclear at this point in time why the APN numbers would differ. This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

**BZ-3**

The Final EIR has been clarified to show the correct name of the street to the south.

**BZ-4**

1. Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD. The Hillel staff at the Cliffridge property support these religious programs. The Cliffridge property is currently used primarily for religious purposes, which is an allowable use in the Single Family Zone in accordance with the LJSPD Ordinance.
2 & 3. The property is not administrative offices as used in the context of this comment. The offices support the primary religious use of the site.
4. The EIR addressed impacts of the project, as described in EIR Chapter 3.
5. The City's Neighborhood Code Compliance Department issued a violation to the applicant, which states:
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| BZ-4 (cont.) | The specific code sections in violation include, but may not be limited to, the following:  
2001 Edition CBC Section 3405: No change shall be made in the character of occupancies or use of any building which would place the building in a different division of the same group of occupancy or in a different group of occupancies, unless such building is made to comply with the requirements of this code for such division or group of occupancy.  
You are required to either obtain the required building permit for the office/temple use OR the approved residence must be restored to its approved dwelling unit use and occupied as a dwelling unit.  
The pending code violation therefore relates to the change to religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support the current use. The issue is intended to be resolved in connection with approval of the proposed project.  
6. This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required. |
| BZ-5 | A portion of the code enforcement violations includes the lack of parking necessary to support the use. See response to comment BZ-45. |
| BZ-6 | Under the Phase 1/Phase 2 project, the temporary use of the Cliffridge property would expire upon completion of the project, and revert back to a single dwelling unit use. Upon occupation of the new facilities under the Phase 1/Phase 2 project, the temporary use of the Cliffridge property would expire and revert back to single dwelling unit use. To identify subsequent ownership or residents of the Cliffridge property would be speculative and beyond the scope of the requirements of CEQA; however, there is no plan for the Cliffridge property to be used as an extension of the project.  
With regards to the cul-de-sac, the ROW vacation would be abandoned to provide landscaping, a pedestrian/cyclist parkway, and park-like amenities, and would not be utilized for parking as detailed in EIR Section 3.4.2.1(f). |
**LETTER**

**BZ-7**

1. Paragraph 4: "The Existing with Improvements option is analyzed throughout this EIR."
   
   - This suggests that the Phase 1/Phase 2 project will not be analyzed.

   "Both the Phase 1/Phase 2 project and Existing with Improvements option are being analyzed at an equal level of detail in this EIR."
   
   - This statement contradicts the one above.
   1. This is very confusing. Which project is the applicant truly proposing? Weren't these both called options in the original DEIR?
   2. The Existing with Improvements option is referred to as an "alternative" at the beginning of this paragraph. Is this considered to be one of the project alternatives required of an Environmental Impact Report under CEQA?
   3. If the Existing with Improvements option is part of the applicant's proposed project, shouldn't it, therefore, be considered part of the whole project and, thus, not a candidate for a project alternative under CEQA?
   4. If the Existing with Improvements option is not intended to be part of the applicant's proposed project, why isn't it referred to as the Existing with Improvements Alternative?
   5. Why aren't other project alternatives treated with the same level of detail?
   6. If the Existing with Improvements option is, indeed, a project alternative as described by CEQA Section 15126.6 why isn't it referred to as the Existing with Improvements Alternative?

**BZ-8**

2. Paragraph 3: "The project site includes two adjacent parcels: a 0.2-acre parcel (APN 344-131-0100) at 6857 Clifford Avenue (Clifford property); and a 0.8-acre vacant lot (APN 344-120-4000)."

   - Please indicate that the Clifford property is an existing single-family residence.
   - Please indicate that the two parcels border, but are currently separated by an existing public street.

   1. Does the applicant hold development rights to both parcels?

**BZ-9**

2. Paragraph 1: "The property also contains a portion of La Jolla Scenic Drive North within the western corner of the site, and the sidewalk along the northern perimeter."

   1. Isn't La Jolla Scenic Drive North a public street? How can the property contain a portion of it?
   2. How much of the street and sidewalk does the property currently legally comprise?

**BZ-10**

2. Paragraph 3: "The project site is served by local bus, express bus transit, and a shuttle service. A bus stop is located on the south side of La Jolla Village Drive adjacent to the project site."

   1. Taken together, these two sentences create the impression that the adjacent bus stop is served by all three services mentioned in the first sentence. Is this true?
   2. Which shuttle service stops at this bus stop?

**RESPONSE**

**BZ-7**

The FEIR has been revised to place all discussion and analysis associated with the Existing with Improvements Alternative within the alternatives chapter of the document.

1. Pursuant to CEQA, the decision makers are able to approve an alternative in lieu of the proposed project.
2. The Existing with Improvements Alternative is considered a CEQA alternative (see Section 9.2.1).
3 & 4. See responses 1 and 2 above.
5. CEQA does not require that alternatives be analyzed at the same level of detail as the proposed project in the EIR. The Existing with Improvements Alternative; however, is analyzed at the same level of detail as the proposed project.
6. The Existing with Improvements Alternative is discussed in FEIR Section 9.2.1. No particular naming convention is required.

**BZ-8**

The two parcels are adjacent. The cul-de-sac ROW is part of APN 344-120-4300 and is not a separate parcel.

1. The City requires an applicant to have legal authority to process an application on a piece of a property. Therefore, the applicant has development rights.

**BZ-9**

1. La Jolla Scenic Drive North is a public street, a portion of which is included in the ROW vacation.
2. The vacant parcel with the ROW is 33,541 sf. Net of the ROW, the parcel is 15,350 sf.

**BZ-10**

1-3. EIR Section 4.2.1.2(b) provides an overview of the bus routes and shuttles. As stated therein, local bus and express bus transit service is provided in the La Jolla community via Routes 30, 41, 101, 921, and 150.

The UCSD campus has an on-site Campus Loop Shuttle system that runs weekdays from 7:00 a.m. to midnight and weekends from 9:00 a.m. to 8:00 p.m. The shuttle service is not public; it serves the students, faculty, and staff of UCSD.
The La Jolla Community Plan was adopted in 2004. Figure 14 of the Community Plan shows the City’s Bicycle Master Plan existing and proposed bicycle network, which was developed in 2003. An update to the Bicycle Master Plan was adopted in December 2013. The portion of La Jolla Scenic Drive North along the southern end of the project site is not designated for any bikeway in the Bicycle Master Plan Update (2013).

The Final EIR has been clarified to state that several sidewalks provide pedestrian access to surrounding areas along the perimeter of the project site.

Payment of school fees would not be required because the project does not propose to construct new residential units, which would result in student generation. Payment of DIFs would be required regardless of whether the applicant is a non-profit organization.

Response time standards are identified in the Public Facilities Element of the City’s General Plan. Fire stations are required to adhere to these standards as their ability to serve new projects.

The comment poses a hypothetical scenario. The EIR evaluated the impacts of the project based on the existing conditions as identified in EIR Chapter 2. Fire Station 9 is the most likely foreseeable responder and the one relied upon in the analysis of impacts.

This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
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<tr>
<td>BZ-17</td>
<td><strong>EIR Chapter 2 provides an overview of the existing Environmental Setting.</strong> An analysis of the project's impacts relative to public services is included in EIR Section 8.4. As determined therein, no impacts would result from implementation of the proposed project.</td>
</tr>
</tbody>
</table>
| BZ-18  | The street name has been corrected in the Final EIR.  
1. There is one water main within La Jolla Scenic Drive North.  
2. The EIR presents accurate information relating to the location of the water main. No revision to the Final EIR is required.  
3 & 4. Within the ROW area, there would be four easements (three for utilities, one for water) that would be reserved from the ROW vacation. All existing water easements and encumbrances would remain, with the exception of a portion of a water facilities easement to be vacated. |
| BZ-19  | Approximately 500 linear feet of the 12-inch water main would need to be removed. Approximately 150 linear feet of the 12-inch water main would need to be removed and replaced with a 16-inch line. Approximately 350 linear feet of the 8-inch water main would need to be removed and replaced with a 16-inch line. |
| BZ-20  | **1 & 2. The ROW vacation would not have any impact on sewer mains.** |
| BZ-21  | **EIR Section 4.10 provides a discussion of hydrological conditions,** and EIR Figure 4.10-1 shows the drainage basins and ditch. The descriptions therein are based on the Hydrology Technical Report (see Appendix I), and are accurately summarized. |
EIR Chapter 2 details the existing conditions applicable to the project. Public services are analyzed in EIR Chapter 7, where impacts were determined to be less than significant.

The General Plan land use maps provide a broad overview of the designated land uses within the City of San Diego. The La Jolla Community Plan provides a much greater detail of the designated land uses within the distinct parts of the community. The Community Land Use Map (Figure 3 of the La Jolla Community Plan) designates the project site as Low Density Residential.
LETTER

b. What plans, if any, have been made for an additional fire station in the project's vicinity and why is there no mention of this in Section 2.4.1.1?

4. The image below was from the document made available at http://www.andsend.org/evacuation/2012/01/fixed/dRAFT-FEIS.pdf as of 4:50 p.m., January 29, 2014. If this document is no longer current, why is it not made available to the public? Further, how can the public be expected to make informed and reasonable decisions during the review process if current information is not made available?

Figure 2

BZ-24

3-1. Paragraph 1. "Hilled currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD."

1. Why does this statement differ from the one in Section 1.1 that implies that no religious programs are currently held at the Cliffridge property?

2. How long has the Cliffridge property been used this way?

BZ-25

"This paragraph would consist of the temporary use of the Cliffridge property as a space to provide for religious programs and construction of temporary structures. Upon occupancy of Phase 2, the temporary use of the Cliffridge property would expire and revert back to a single dwelling unit use."

1. Since both the Phase 1/Phase 2 option and the Existing with Improvements options require approval before either is put into effect, what would happen to the current use should neither of the options be approved?

2. In the event that the proposed project is not approved, would continued use of the Cliffridge property be allowed if a new project is approved? If so, how long would this situation be allowed to continue?

BZ-26

3-1. Paragraph 2. "If the Phase 1/Phase 2 project is not approved, Hilled would permanently use the Cliffridge property to provide for religious programs for Jewish students at UCSD including meetings, one-on-one counseling, and administrative offices."

• This statement presumes approval of the Existing with Improvements option if the Phase 1/Phase 2 project is not approved. Please revise to begin as: "If the Existing with Improvements option is approved."

1. Does the applicant own this property? If not, would a transfer of ownership occur?

2. What would happen to the vacant parcel proposed to be developed under Phase 1/Phase 2?

RESPONSE

BZ-24

1. See response to comment BZ-4. The Cliffridge property currently is used primarily for religious purposes.

2. The comment regarding the current use of the property does not raise any issue related to the substance or adequacy of the EIR.

BZ-25

1. As detailed in EIR Section 9.2.2.1, under the No Project Alternative, no improvements are proposed.

2. The code violation related to the site use would require resolution with the City.

BZ-26

The sentence is taken out of context; the paragraph is describing what would occur under the Existing with Improvements Alternative.

1. Property ownership is not relevant to the assessment of physical impacts pursuant to CEQA. This comment regarding ownership does not raise an issue related to the content or adequacy of the EIR. No further response is required.

2. The applicant ultimately would decide what to do with the vacant parcel. The Existing with Improvements Alternative does not include development of the vacant parcel.

3. "Piecemealing" has been addressed through CEQA case law, which holds that "an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." Reversion to a single-family dwelling unit is not an "expansion" of the proposed project, nor does it trigger the need for further or different environmental review.
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<tr>
<td>BZ-27</td>
<td>1-4. City application of code enforcement issues is outside the scope of this CEQA document. This comment does not raise an issue related to the content or adequacy of the EIR. No further response is required.</td>
</tr>
<tr>
<td>BZ-28</td>
<td>The project objectives detailed within the EIR include the underlying purpose of the project and are clearly written in order to help the lead agency develop a reasonable range of alternatives to evaluate, as required by Section 15124(b) of the CEQA Guidelines.</td>
</tr>
<tr>
<td>BZ-29</td>
<td>The project description clearly articulates that the project site is off-campus.</td>
</tr>
<tr>
<td>BZ-30</td>
<td>See response to comment BZ-29.</td>
</tr>
<tr>
<td>BZ-31</td>
<td>The southern portion of campus is preferred because of the close proximity to activities on campus. However, as detailed in EIR Section 9.1, alternative locations were analyzed on more than just the south side of UCSD campus. No alternatives were rejected because they were not located on the south side of campus.</td>
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BZ-32 1 & 2. EIR Section 3.6, “History of Project Changes,” details the previous project history and the changes to the Phase 1/Phase 2 project.

3a. EIR Section 1.4.1, states the following:
The scope of analysis for this EIR was determined by the City as a result of initial project review and consideration of comments received in response to the Notice of Preparation (NOP) circulated October 8, 2010, and a scoping meeting held on October 27, 2010, at the La Jolla Branch Library, 7555 Draper Avenue.

3b. The development application for the current project was deemed complete on July 28, 2011.

3c. The Preface to the Recirculated EIR states the following:
This original Draft Environmental Impact Report (EIR) was circulated for public review beginning October 31, 2012, and ending December 17, 2012. The City of San Diego (City), as the Lead Agency, identified the need to recirculate the original EIR because new information was added after public review. The Draft EIR was recirculated for public review from January 23, 2013 to March 11, 2013. The City, as the Lead Agency, has identified the need to recirculate the Draft EIR once again because new information has been added after the Draft EIR was recirculated.

3d. As detailed in the Preface, the City, as the Lead Agency, identified the need to recirculate the Draft EIR again because new information was added after the Draft EIR was recirculated. The Preface states:
Planned development projects within the vicinity of the project site have been added to Chapter 7, Cumulative Impacts. The traffic impact analysis and other environmental issues have been revised as applicable. Additional information includes a construction traffic analysis, an updated biological survey, an updated analysis on the potential for on-site generated noise, and further clarification of the Phase 1/Phase 2 project (such as the size of the street vacation, street dedication, easements, and lot coverage).

BZ-33 The referenced sentence has been removed from the Final EIR. However, pursuant to CEQA, the lead agency may select either the proposed project or one of the alternatives.
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<td>BZ-34</td>
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<td>BZ-35</td>
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<td>BZ-36</td>
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<td>BZ-40</td>
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<td>BZ-41</td>
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</table>
BZ-42 3-3. Paragraph 5: “If the Phase 1/Phase 2 project is not approved, the applicant seeks approval of the Existing with Improvements option.”

1. This really sounds like the applicant is proposing two different projects in one EIR. Either the Existing with Improvements option is a project in and of itself or it is simply one project alternative under CEQA. Which is it?

BZ-43 1. This option would allow the Cliffridge property to be brought up to code and by implementing current requirements to support its religious use.

2. See response to comment BZ-4 regarding the code violation.

3. The applicant ultimately would decide what to do with the vacant parcel. The Existing with Improvements Alternative does not include development of the vacant parcel.

BZ-44 1. See response to comment BZ-4.

2 & 3. Hillel was incorporated in the state of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “. . . is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

4. As detailed in Section 3.2.2 of the EIR, the Phase 1/Phase 2 project would be used primarily for religious purposes, including a variety of programs such as meditation and prayer circles, observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel, and other Jewish religious, cultural, and social events. Please refer to Section 3.4.2.1(a) of the EIR for a detailed discussion of the operations that would occur under the Phase 1/Phase 2 project. As demonstrated by the project description, the project proposes a facility that would be used primarily for religious purposes. The project is not a “student center” as the commenter uses the term. The fact that the project is intended for use by students does not detract in any way from the religious nature of the facility. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within the residential zone in accordance with the City Municipal Code.

BZ-45 The FEIR has been revised to substitute the word “include” for “including.” The second-story balconies are not counted as part of the GFA.
1-3. The project is called the Hillel Center for Jewish Life and is comprised of three buildings. The three building complex includes space for religious services and Jewish learning (Library/chapel), office space for our professionals, and space for programs including group discussions, holiday celebrations and leadership development.

1. Hillel's mission is explicitly stated in the EIR and is to serve as a religious center for Jewish students at UC San Diego. Therefore, the majority of Hillel's programs would be geared toward and open to the undergraduate student audience. However, at times throughout the year, certain programs including study sessions, small religious gatherings, and discussion groups would be open to the public.

2. Hillel engages its alumni in support of programs and to work with students. Alumni are occasionally invited to visit the facility and interact with students; however, there is no alumni association, nor any plan to hold regular alumni programming.

3. There would not likely be events when UCSD is not in session, although the facility would be open.
1. Would any of these activities, such as lectures, be open to visitors who are not students attending UCSD?
2. Is there any sort of "alumni" organization which might use the facility for events or participate in regular programming?
3. What sort of events might be held when UCSD is not in session?

With its proximity to campus, the Hillel would also serve as a place for students to "drop in" and connect with fellow students and Hillel staff, eat, or study.

1. Could the facility ever be made available to members for private functions (such as club meetings, parties, etc.)?
2. If so, what recourse might neighbors have of protecting themselves in the event that the facility becomes a hosting/entertainment venue?

1. It would only be a special event that would occur outside of the stated hours. As stated in EIR Section 3.4.2.1(a) Hillel’s regular hours of operation would be between Monday through Friday, 9:00 a.m. to 10:00 p.m. The facility would only be open during the evenings and on weekends if there is a special event/activity planned at such times.

2. EIR Section 3.2.2 provides examples of facility events, including: discussions and small activities to connect Jewish students with each other and help build the Jewish community. The Hillel would be used to host a variety of programs to serve the spectrum of the UCSD Jewish student community.

3. The project buildings would be limited for the use of the Hillel organization.

4. Tritons for Israel is one of many Jewish student organizations at UC San Diego. Hillel’s mission is to support Jewish students at UC San Diego and provide its professionals and facilities as resources in inspiring their development as citizens and Jewish adults.

5. Occupancy limits would restrict the number of people allowed at any event.

6. Hillel’s mission is to enrich the lives of Jewish students and work to support all students at UC San Diego in making an enduring commitment to Jewish life, learning and Israel, through mentorship, religious services, and community building. Hillel would continue to partner with groups across the university in support of these goals.

7. Occupancy limits would restrict the number of people allowed at any event.

8. See number 6, above.

9. See response to comment BZ-48-1.

10. Occupancy limits would restrict the number of people allowed at any event.

11. Parking would be restricted. A Parking Management Plan would be required for all events that triggered the need for excess parking.
LETTER

1. See Appendix E to the Traffic Impact Analysis (EIR Appendix B). Of the 51 events, 20 were held off-site at a rented, temporary location. Past occupancy limits are not known at this time. Proposed occupancy would be limited. As stated in the project description of the recirculated EIR (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 project site.

The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger implementation of a Parking Management Plan. Overall, it is anticipated that up to eight times a year, occupancy could be between 100 to 150 people, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

2. As required under CEQA Guidelines Section 15125(a):

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published.

The NOP was published on October 8, 2010. Therefore, the baseline conditions are adequately described.

RESPONSE

BZ-50
With respect to occupancy, see response to comment BZ-50-1.

With respect to trip calculations, as detailed in DEIR Section 4.2.3.1(a), there are no local or national trip generation rates that exist for this specific type of facility/land use. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. According to the Institute of Transportation Engineers (ITE) Trip Generation Handbook, 3rd Edition, if the study site is not compatible with an ITE land use code definition, local data should be used. This is further defined as the process to be utilized in the flow chart developed by ITE (see Attachment 1).

The trip generation rate and mode-share assumptions employed in the traffic analysis are based upon similar Hillel facilities within California.

Historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project.

The traffic study utilized conservative mode share assumptions—which included an 80/20 split of students walking to driving and a total ADT of 58 vehicular trips, as shown in EIR Table 4.2-4. The 20 percent drive assumption is considered conservative (i.e., higher than expected) since surveys showed less than 20 percent of the students typically drive to such facilities. Based on the trip generation assumed for the project, the TIA did not identify any significant traffic impacts on the circulation network. Therefore, the DEIR accurately summarized potential vehicle trips to the project site.

To evaluate a worst-case scenario, a subsequent analysis assuming all PM peak hour users of the site drive to the site in single occupancy vehicles. The worst-case scenario analysis revealed that adequate Levels of Service (LOS) are calculated at each of the key intersections using the assumption that all PM peak hour users drive to the site in single occupancy vehicles. The results of the worst-case scenario found no significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis results.
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<tr>
<td>BZ-52</td>
<td>Occupancy would be capped and parking off-site would be required if the event was expected to generate over a maximum number of occupants. See responses to comments BZ-50 and BZ-51.</td>
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<tr>
<td>BZ-53</td>
<td>It is unclear what the comment is requesting; however, see EIR Section 3.2.2, which provides details of the project's component parts.</td>
</tr>
<tr>
<td>BZ-54</td>
<td>1 &amp; 2. The Existing with Improvements Alternative would entail a facility that would be used primarily for religious purposes. It is not an &quot;office use&quot; as the commenter uses the term.</td>
</tr>
<tr>
<td>BZ-55</td>
<td>Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for &quot;[c]hurches and places of religious assembly.&quot; This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being &quot;seats,&quot; &quot;pew space,&quot; and/or &quot;assembly area.&quot; The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities.</td>
</tr>
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As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities.
Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking for its intended use and the EIR adequately determined that parking impacts would be less than significant.

In order to address those events (special events throughout the year), where parking demand exceeds the proposed on-site parking, the project would implement a Parking Management Plan I. This plan could include parking alternatives such as shuttle service, leasing additional spaces off-site, parking notifications with event registrations, etc. On a daily basis (during regular hours of operation and programs), Hillel staff would provide regular monitoring of the parking lot to ensure that all individuals parked on-site are presently using the facility. Unattended cars will be subject to towing, etc. Signage will be placed in the lot specifying this condition. Through the preparation and enforcement of this plan, potential concerns raised by the public identified with parking would be alleviated.
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<tr>
<td>BZ-56</td>
<td>See response to comment BZ-135.</td>
</tr>
<tr>
<td>BZ-57</td>
<td>This sentence has been revised in the Final EIR to the following: “Landscaping would also include temporary bike path fencing (to be removed once Phase 2 is completed) and development of a new replacement bus stop on La Jolla Village Drive.” There is a “bus only” lane that currently exists at the bus stop; therefore, no bulb out would be required.</td>
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<tr>
<td>BZ-58</td>
<td>The project proposes approximately 10,000 square feet of park-like landscaping and amenities. See EIR Chapter 3.</td>
</tr>
<tr>
<td>BZ-59</td>
<td>See the response to comment BZ-11.</td>
</tr>
<tr>
<td>BZ-60</td>
<td>Landscaping plans are included within the EIR. Refer specifically to EIR Figures 3-9 through 3-11.</td>
</tr>
<tr>
<td>BZ-61</td>
<td>1 &amp; 2. No entrance would be available to the buildings from the southern perimeter of the project site. There is emergency egress to the south from the site, but there is no access to the site. 3. The visual angles provided in the EIR Figure 3-13A depicting screening elements from residential homes.</td>
</tr>
</tbody>
</table>
LETTER

Village Drive and La Jolla Scenic Drive North. Figure 3-14 provides a visual of the screening elements.

1. This suggests that pedestrian access to the facility will be made from both the North and the South. Is this correct?
2. As a measure to reduce the impact on nearby residential homes and to encourage pedestrian orientation away from the family neighborhood, would it be possible to close the pedestrian access from La Jolla Scenic Drive North?
3. The visual angles in Figures 3-13A, 3-13B, and 3-14 appear to be from above/northwest, north, and northeast, respectively. Are there any views of proposed screening elements from angles other than those away from residential homes?

RESPONSE

BZ-62

1. The entrance sign would be located at the northeast corner of the site, near the intersection of La Jolla Village Drive and La Jolla Scenic Way.
2. See EIR Figure 3-14, which shows the wall where the sign would be located.

BZ-63

1. The collection truck would likely back into the driveway, lift the trash receptacle onto the truck, empty it, and then pull straight out to La Jolla Scenic Drive.
2. The truck likely would come once a week, during the day.

BZ-64

Only demolition of the Cliffridge property driveway and curb would be required. The Final EIR has been clarified.

BZ-65

1. The Cliffridge property would not gain any square feet through this action.
2. This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

BZ-66

Numerous options are available for where construction workers would park and would be approved by the City prior to issuance of construction permits.
LETTER

BZ-67 3-45. Paragraph 1: “As detailed above in Section 3.3.1.3, Phase 1/Phase 2 proposes a ROW vacation, utility easement reservations/dedications, and a street dedication.”

• Section 3.3.1.3 does not make any mention of easements or dedications.

BZ-68 “As shown in Figure 3-18, the total area of the ROW vacation along La Jolla Scenic Drive North would total 0.49 acre (22,278 square feet).”

• Taken in conjunction with the descriptions of the site in Sections 1.0 and 3.4.2.1.j this statement could be confusing:
  • If the size of lot APN 344-120-4300 is taken as 0.8 acre (as described in Section 1.0), a reader might be led to believe that the ROW vacation would represent a 60% increase over the original lot size.
  • (0.8 + 0.49) / 0.8 = 1.5125
  • Section 3.4.2.1.j lists the size of the existing site area, without street dedication and the ROW vacation, uses a different unit of measure: square feet. While this is not, in and of itself, wrong, many readers do not carry a conversion figure in their heads and will simply assume that the acres and square feet listed match in the way each number is used (which is subtly different or couched for each section). To clear this confusion, Section 1.0 should include the proper size of APN 344-120-4300 (approximately 0.4-acre) and parenthetically include the amount in square feet (approximately 17,533); further, in the interests of clarity, Section 3.4.2.1.j should initially include a sentence stating that the existing Phase 2 site area comprises 17,533 square feet (0.4-acre).

BZ-69 Phase 1/Phase 2 would also dedicate a 2.183-square-foot area along the northern property frontage along La Jolla Scenic Drive to the public ROW. Figure 3-17 shows the proposed ROW dedication along the northern perimeter of the project site.”

• According to Figure 3-17 and the description in the second sentence, the dedication would be the frontage along La Jolla Village Drive not La Jolla Scenic Drive North.

“This area would include a new sidewalk constructed per City standards, native landscaping, and a new bus stop.”

1. As Figure 4 (below) shows, this area already includes both a bus stop and a sidewalk. What is the direct public benefit of such a dedication?

RESPONSE

BZ-67 This sentence has been revised to remove the reference to Section 3.3.1.3 in the Final EIR.

BZ-68 The EIR provides an accurate project description (see Chapter 3) in accordance with the requirements of Section 15124 of the CEQA Guidelines. Specifically, the existing vacant lot upon which the project is proposed is a total of 0.80 acre. The project also includes a ROW vacation which would add an additional 0.49 acre to the project site. Therefore, upon project approval, the total site would be 1.29 acres. See EIR Figures 3-1 (size and location of ROW vacation) and 3-3 (final boundaries of the project site).

BZ-69 While a specific direct benefit so not required to be identified, the new walkway and landscaping would provide a safer access across the property and provide a general aesthetic appropriate for the neighborhood.
BZ-70

2. Some of the neighbors’ concerns center around impacts related to bulk and scale; therefore, a reduction in such impacts (real or perceived) would be beneficial to the project. If the dedication were omitted, could the Phase 2 facilities be moved North by 12 feet, thus creating more separation between the facility and residential homes, reducing the impacts created by bulk and scale, and eliminating the need for at least a portion of the proposed ROW vacation and the intended 2-foot reduction in the width of La Jolla Scenic Drive North?

BZ-71

“Phase 1/Phase 2 proposes to narrow La Jolla Scenic Drive North by 2 feet to provide for a 12-foot roadway on the north side of the roadway with increased landscaping.”

1. What is the required setback on this side of the property?
2. Is the setback along La Jolla Scenic Drive North of a similar nature (i.e., front yard setback vs. side or rear yard setbacks) to those of the residential homes located on the south side of the street?
3. What is the distance from the edge of the proposed Phase 2 structures to the edge of the narrowed street?
4. According to Figure 3-16, the total width of the proposed ROW vacation is 51 feet. With this amount of space, what is the rationale for narrowing the street? Surely a reduction of less than 4% would make little difference?
5. Given that the cul-de-sac will be lost and the stop sign located on northbound Clifford Avenue will be eliminated to create a single roadway with an acute turn, was any consideration given to using some of the vacated ROW area to enlarge the curvature of the Clifford Avenue/La Jolla Scenic Drive North bend (and thereby reducing the bend’s scaly) in order to create a safer turn for both motorists and pedestrians?

BZ-72

“La Jolla Scenic Drive North currently measures 36 feet wide from curb to curb. As detailed in Section 4.2.5.1, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards.”

BZ-70

EIR Section 4.12.4.1 discusses the project’s impacts relative to bulk and scale. The recirculated EIR was updated (December 2013) to include information pertaining to the project’s consistency with the La Jolla Shores Design Manual (see EIR Sections 4.1 and 4.12). As analyzed in Section 4.12.3.1(a) of the EIR, the proposed Phase 1/Phase 2 option would conform to the architectural and design standards of the La Jolla Shores Planned District Ordinance, and the La Jolla Shores Design Manual and would be consistent with the existing neighborhood character. The plan proposes predominately one-story buildings, with the two-story section of the facility relating to the existing two-story residence directly across La Jolla Scenic Drive. As illustrated in Figures 3-4, 3-5, 3-6, 3-12, and 3-13 of the EIR, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site and would be consistent with the visual appearance of surrounding development. Likewise, the Phase 1/Phase 2 proposal would comply with relevant height, bulk, and coverage regulations, resulting in setbacks that generally conform to other neighboring building setbacks (see response to comment K-13). With respect to proposed architecture and landscape, the proposed design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would be consistent with the neighborhood character. Overall, the EIR addresses the project’s consistency with neighborhood character in detail concluding that impacts related to the visual appearance would be less than significant.

BZ-71

1 & 2. The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section 4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project’s consistency with all relevant regulations. Section 4.1.4.1(a) of the EIR analyzes the Phase 1/Phase 2 project in relation to the siting of buildings and setbacks. As stated therein, and as shown in Figure 4.1-1, the proposed approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

3. As shown in EIR Figure 3-4, setbacks are approximately 10-feet.
4. Narrowing the street would provide a dedicated, 12-foot pathway along the north side of La Jolla Scenic Drive North. If the street is not reduced, this enhanced, landscape pathway provided to the residents would not be feasible.

5. The turn is not “acute” and has been designed in accordance with City standards. A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.

1 & 2. As detailed in EIR Section 4.2.5.1(a), La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. According to the City’s Street Design Manual, Local Streets (residential streets) are required to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. The proposed reduction in width of La Jolla Scenic Drive detailed in EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Local Street in the La Jolla Community Plan. Per the City’s Street Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.
BZ-72 (cont.)

3. No elimination of on-street parking along La Jolla Scenic Drive North is proposed.

4. CEQA does not require the examination of all possible scenarios. The EIR analyzed impacts based on the existing conditions as identified in Chapter 2. Therefore, this comment does not raise an issue related to the content or adequacy of the EIR. No further response is required.

5. The street would conform to the City’s street design manual, which takes into account the movement of public safety vehicles.

6. It is unclear what this comment is referencing. EIR Chapter 8 evaluated potential impacts associated with public services and found no impacts would occur.

7. The ROW vacation/width reduction of La Jolla Scenic Drive North is considered as part of the project description in EIR Chapter 3, and therefore, is taken into consideration in the analysis relative to each issue in the EIR.
LETTER

1. Figure 5 (below) shows current conditions along La Jolla Scenic Drive North (at 36 feet in width). With the current width, does it appear that two vehicles could pass each other without difficulty?

2. Would passage of two vehicles in opposite directions be possible with the street width reduced by two feet?

3. Has any consideration been given to eliminating parking along one side of La Jolla Scenic Drive North? Why or why not?

4. While the current project plan does not call for any loss of on-street parking along the north side of La Jolla Scenic Drive, what is to prevent that side of the street from being red-curbed in the future?

5. What distance is required for the movement of public safety vehicles (fire trucks, ambulances, etc.)?

6. In accordance with City standards notwithstanding, is increased landscaping preferred over public safety?

7. Why is no mention made of any other impacts approval of the ROW vacation might have on La Jolla Scenic Drive North, other nearby streets, and general traffic flow?

BZ-73

3-49. Paragraph 2: “All water facilities necessary to provide water service (domestic, irrigation, and fire) to the project site already exist at sufficient capacity to adequately serve the Phase 1/Phase 2 project.”

1. To where will the fire hydrant in the cul-de-sac (seen in Figure 6, below) be moved? Will it still be able to serve all of La Jolla Scenic Drive North as well as the Torrey Pines Road, La Jolla Village Drive intersection adequately?

2. Where are the next three nearest fire hydrants to the site located?

RESPONSE

BZ-73

1. As identified in EIR Figure 3-4, the relocated fire hydrant would be towards the western portion of La Jolla Scenic Drive north along the southern frontage of the property.

2. The EIR discussed the fire hydrants relative to the project. This comment does not raise an issue related to the content or adequacy of the EIR. No further response is required.
LETTER

3-49. Paragraph 4: "The existing Phase 2 site area, without the proposed ROW vacation and dedication, is 16,350 square feet. The proposed Phase 2 site area, with the proposed ROW vacation and dedication, would total 33,641 square feet."

1. Could Phase 2, as described, be constructed without approval of the ROW vacation?
2. Is the City the current owner of the land that would be given up in the ROW vacation?
3. Section 3.4.2.1 describes the street dedication as comprising 2,183 square feet. Would it be fair to infer, then, that the existing Phase 2 site area, in its entirety, comprises 17,533 square feet?
   o 15,350 sf + 2,183 sf = 17,533 sf
4. Assuming that the above is correct and given that the applicant purchased the existing 17,533-square-foot property from the City in 2006 for $946,000, would it be fair to determine the approximate value of the area comprising the ROW vacation as approximately $1,140,781?
   o $946,000 × (21,278 / 17,533) = $1,140,781
5. Why, after selling a smaller parcel of land, should the City, this time, consider giving away a greater amount of land for free?
6. Considering that the applicant’s original parcel will more than double in size following the ROW vacation, has any offer of monetary compensation been offered to the City? Why or why not?
7. Would it be correct to say that 18,191 sf (approximately 85% of the total ROW vacation) would go to the Phase 2 site?
   o 33,541 sf – 16,350 sf = 18,191 sf
   o 18,191 sf / 21,278 sf = 0.85492
8. Does this mean that the Cliffridge property would gain the remaining 3,087 sf (approximately 15%) of the ROW vacation area?
   o 21,278 sf – 18,191 sf = 3,087 sf
   o 18,191 sf / 21,278 sf = 0.06407
9. I could not find an exact size for the Cliffridge property other than the approximate 0.2-acre listed in Section 1.9 and a few other locations in the document. Is such a number provided?

RESPONSE

1. The ROW vacation is a component of the proposed project and is required to meet design regulations.
2. Hillel, not the City, owns the vacant site (APN 344-120-43) which includes the ROW vacation.
3. The existing Phase 2 site area (i.e., the vacant site), is 33,541 square feet, or 0.8 acre.
4, 5, 6 & 13. This comment related to cost of the property, does not raise an issue related to the content or adequacy of the EIR. No further response is required.
7. The size of the vacant site is approximately 0.8 acre which includes the area of the ROW vacation.
8, 11, 12, & 13. The ROW vacation is not part of the Cliffridge property, and the Cliffridge property does not grow as a result of the ROW vacation.
9 & 10. The lot size of the Cliffridge property is 0.2 acre.
14. This comment does not raise an issue related to the content or adequacy of the EIR. No further response is required.
**LETTER**

10. Would it be fair to say that the lot size of the Cliffride property is approximately 8,712 square feet?
   - 0.2 acre x 43,560 sf/acre = 8,712 sf

11. Based on the approximate lot size, would it be fair to characterize the addition of its share of the ROW vacation as a 35% increase of the Cliffride property?
   - (8,712 sf + 3,087 sf) / 8,712 sf = 1.354

12. Why is this material gain for the property owner of the Cliffride property never explicitly stated in the discussion regarding the ROW vacation or lot coverage?

13. Was consideration ever given to grant the owners of the property on the south side of La Jolla Scenic Drive North a commensurate share of the ROW vacation?

14. Why should the City’s largesse of potentially more than $1 million go to only two of the property owners whose parcels lie adjacent of the proposed ROW vacation?

**RESPONSE**

**BZ-75**

1. As detailed in EIR Chapter 3, the existing Phase 2 site area, without the proposed ROW vacation and dedication, is 15,350 square feet. The proposed Phase 2 site area, with the proposed ROW vacation and dedication, would total 33,541 square feet. The proposed lot coverage for Phase 2, with the landscaped area, would be 15.8 percent (5,291 square feet divided by 33,541 square feet).

2. Lot coverage is calculated only using the ground floor area.

3. Only the ground floor area of the structures is included in the 5,291 sf and does not include the parking lot or other paved improvements. This is industry and City standard for calculating lot coverage.

4. All City Land Development Code development standards are met for the Phase 2 project with the exception of a requested deviation from the driveway curb cut requirements and parking. See EIR Section 3.3.1.1.

**BZ-76**

See response to comment BZ-7. The discretionary approvals required for the Existing with Improvements Alternative is included in FEIR Section 9.2.1.

1. There would be six staff members serving the Existing with Improvements Alternative.

2. The referenced log is associated with the Cliffride property.

3. Programming at the Cliffride property under the Existing with Improvements Alternative would be similar to that proposed under the Phase 1/Phase 2 project.

4. Occupancy limits would restrict the number of people allowed at any event.

5. The No Project Alternative discusses the scenario under which no project is approved and the existing conditions would remain. See EIR Section 9.3.

6. This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

7. The applicant would remain the owner of the property and ultimately would decide what to do with the vacant parcel.
6. Would the conversion to permanent use include a change of ownership of the Cliffridge property?

7. If the Existing with Improvements option is approved, what would happen to the lot identified as APN 344-120-4300? Would its ownership continue to be retained by the applicant?

8. As approval of the Existing with Improvement option would, by necessity, require that the Phase 1/Phase 2 project was not approved, it is a reasonably foreseeable consequence that the applicant may propose a project similar in nature to the Phase 2 project at some future date. Given that the combination of Phase 1 and Phase 2 had not been approved, could future consideration of such a project on the proposed site of Phase 2 be construed as piecemealing? Why or why not?

BZ-76 (cont.)

8. “Piecemealing” has been addressed through CEQA case law, which holds that “an EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” Reversion to a single-family dwelling unit is not an “expansion” of the proposed project, nor does it trigger the need for further or different environmental review.

BZ-77 The reference to the Municipal Code table has been revised to reflect that it is Table 142-05G, not Table 142-05F.

1. See the response to comment BZ-44.

2 & 3. With respect to required parking, see response to comment BZ-55.

BZ-77 The reference to the Municipal Code table has been revised to reflect that it is Table 142-05G, not Table 142-05F.

1. See the response to comment BZ-44.

2 & 3. With respect to required parking, see response to comment BZ-55.

BZ-78 The requested deviation is detailed earlier in EIR Section 3.3.1.1.

BZ-79 The bicycle path that would be provided with the Phase 2 project would provide enhanced access to all cyclists who seek to use this route.
<table>
<thead>
<tr>
<th>LETTER</th>
<th>RESPONSE</th>
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</table>
| BZ-80 | 1. A new left/curve sign would be installed.  
2. A sign indicating a curve from the right side would not be necessary. See EIR Section 4.2 for the traffic safety analysis. |
| BZ-81 | 1 & 2. See the response to comment BZ-72. |
| BZ-82 | 1. The sentence is referring to the Phase 2 facilities.  
2. The sentence is referring to the ability to enter the premises of the structure.  
3. The sidewalks around the Phase 2 site would be contiguous. |
| BZ-83 | Pedestrians would not be able to access the Phase 2 site along the bike path from Torrey Pines Road/La Jolla Village Drive. This has been clarified in the Final EIR. |
| BZ-84 | This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required. |
| BZ-85 | 1. See the response to comment BZ-4.  
2-6. This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required. |
<table>
<thead>
<tr>
<th>LETTER</th>
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<tr>
<td>pursue its religious purposes and mission while development of a permanent space was considered.”</td>
</tr>
</tbody>
</table>

1. Why was this property not brought up to code (as is being required in both Phase 1 and the Existing with Improvements option) in 2003 when the property was renovated?
2. Does the private nonprofit foundation currently own the Clifford property?
3. Would the private nonprofit foundation retain ownership of the Clifford property following the completion of the Phase 1/Phase 2 project?
4. Would the private nonprofit foundation profit from the Phase 1/Phase 2 project by way of an approximately 3,087-square-foot increase in the size of the property?
5. Would the private nonprofit foundation retain ownership of the Clifford property should the Existing with improvements option be approved?
6. What is the name of the private nonprofit foundation? Why is it not included anywhere in the environmental document?

<table>
<thead>
<tr>
<th>RESPONSE</th>
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<tbody>
<tr>
<td><strong>BZ-86</strong></td>
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<td><strong>BZ-87</strong></td>
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<td><strong>BZ-88</strong></td>
</tr>
</tbody>
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<p>| BZ-86 | Paragraph 4: “The HCJL was originally proposed in 2004 and included construction of an approximately 13,000-square-foot building to establish a permanent location for UCSD Hillel activities.” |
|--------| For the sake of clarity, please include the information and corrections contained in the comments regarding this entire paragraph. |
| <strong>BZ-87</strong> | “Site 853, along with the vacated ROW, was sold by the City to Hillel in 2006 pursuant to City Council Resolution R-301433.” |
| <strong>BZ-88</strong> | “The City Council approved a Mitigated Negative Declaration, SDP, Planned Development Permit, and Street Vacation for the construction of the larger Hillel Center in 2008.” |
| <strong>RTC-892</strong> | |</p>
<table>
<thead>
<tr>
<th>LETTER</th>
<th>RESPONSE</th>
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<tbody>
<tr>
<td>BZ-89</td>
<td>This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required. However, in prior litigation challenging the project, the court upheld the City’s findings in support of the right-of-way vacation, and agreed that the City did not abuse its discretion in approving the vacation.</td>
</tr>
<tr>
<td>BZ-90</td>
<td>This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.</td>
</tr>
<tr>
<td>BZ-91</td>
<td>The sentence as structured is accurate and refers to the proposed project. No revision to the EIR is required as a result of this comment. Traffic impacts associated with the proposed project are discussed in EIR Section 4.2.</td>
</tr>
<tr>
<td>BZ-92</td>
<td>The prior project required a permanent curb cut deviation, whereas the current Phase 1/Phase 2 project requires a temporary curb cut deviation.</td>
</tr>
<tr>
<td>BZ-93</td>
<td>This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.</td>
</tr>
<tr>
<td>BZ-94</td>
<td>The project site comprises two parcels. This sentence is accurate relative to the project site. No revision to the EIR is required as a result of this comment.</td>
</tr>
</tbody>
</table>
BZ-95  "The project site is surrounded by residential and institutional uses."
   • It would be more correct to say that the project site lies at the northern edge of
     properties designated for residential use and borders an institutional use to the north.

BZ-96  "La Jolla Village Drive, a major roadway, and the UCSD campus are situated to the north; La
     Jolla Scenic Drive North and a single-family residential neighborhood are to the south. To the
     east lies La Jolla Scenic Way. Further east are attached single-family residences."
   1. Why are the single-family residences to the east described as “further east,” when they
     abut La Jolla Scenic Way at a distance proximate to the distance that of the single-family
     residences to the south abut La Jolla Scenic Drive North?

BZ-97  4.1.1. Paragraph 5: "The General Plan Land Use Element identifies the project site in the
     General Plan’s Land Use and Street System Map (contains in the Land Use Element, Figure
     LU-2) as Residential. The area of the cul-de-sac is designated as
     Roads/Freeways/Transportation and the northeast corner of the project site (0.17 acre) is
     designated as Park, Open Space and Recreation."
   • As noted above, the on-line, publicly available version of this document, located at
     http://www.sandiego.gov/planning/growth/ctd/generplan/lucitystreet.pdf, does not
     appear to indicate any Park, Open Space and Recreation designation. Indeed, much of
     the project site is covered by a symbol denoting the proposed location for a new fire
     station.

BZ-98  "With the exception of the La Jolla Athletic Area (Allen Field) to the west which is designated as
     Park, Open Space, and Recreation, the project site is surrounded to the north and west by large
     areas of Institutional and Public and Semi-Public Facilities which are made up by USCD and the
     Scripps Institute of Oceanography."
   • It would be more correct to say that the project site is "bordered" rather than
     "surrounded."

BZ-99  4.1.6. Paragraph 7: "Per the City’s Municipal Code (Section 142.0530, Table 142-05F), for
     professional office uses, 3.3 parking spaces are required per 1,000 square feet of gross floor
     area."
   • SDMC Section 142.0530, Table 142-05F relates to “Parking Ratios for Eating and
     Drinking Establishments.” The correct Table would be 142-05G: “Parking Ratios for
     Specified Non-Residential Uses.”
   • Please refer to comments made for Page 3-50, Paragraph 2.

BZ-100  4.1.10. Paragraph 2: "The parking area would be shielded from view along Torrey Pines Road
     by existing walls and from the adjacent single-family residence by landscaping."
   1. What is the distance from the parking area to the southern property line?

EZ-99  See the response to comment BZ-55.

EZ-100  1. From where the cars will be parked, it is approximately 10 feet
     away from the property line. From where the turnaround area is
     located, it would be approximately 3 feet away.
   2. This distance is approximately 5 feet.
   3. The landscaping would be in accordance with City requirements.
     If this option is selected, a landscape plan would be submitted to
     the City for approval.
   4. Shielding would occur through the planting of larger trees. See
     response (3).
<table>
<thead>
<tr>
<th>LETTER RESPONSE</th>
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<tbody>
<tr>
<td><strong>BZ-101</strong> 1. The front of the project would be La Jolla Village Drive.</td>
</tr>
<tr>
<td>2. A street address would be provided at subsequent permitting actions.</td>
</tr>
<tr>
<td><strong>BZ-102</strong> With respect to parking numbers, see response to comment BZ-55.</td>
</tr>
<tr>
<td><strong>BZ-103</strong> There would be no “sharp” curve along the realigned roadway. The curve, and the roadway, has been designed in accordance with City standards. A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway would require 200 feet of stopping sight distance. There is adequate sight distance (250 feet) for vehicles exiting the proposed driveway to see vehicles making a westbound-to-southbound left turn from La Jolla Village Drive onto La Jolla Scenic Way. Vehicles making an eastbound-to-southbound right turn from La Jolla Village Drive onto La Jolla Scenic Way would travel at lower speeds due to the turning radius and yielding to pedestrians. Approximately 125–150 feet of stopping sight distance would be required. To achieve the required stopping sight distance, 25 feet of red curb would be provided to the north of the proposed driveway.</td>
</tr>
<tr>
<td><strong>BZ-104</strong> 1. The City of San Diego Development Services Department reviews all project site plans for conformance with applicable plans, ordinances, and manuals. The project has been deemed to be in conformance with the La Jolla Shores Design Manual.</td>
</tr>
<tr>
<td>2. The signs are currently anticipated to say the lead donor’s name, followed by “Hillel Center for Jewish Life.”</td>
</tr>
<tr>
<td>3. The wall is approximately 20 feet long. See EIR Figure 3-4.</td>
</tr>
<tr>
<td>4. This would be a ground sign mounted on a wall.</td>
</tr>
<tr>
<td>5 &amp; 7. The sign has not been fully designed; however, it would comply with applicable regulations.</td>
</tr>
<tr>
<td>6. The sign may be slightly illuminated by low-wattage spotlights in order to indicate to visitors where the entrance to the facility is.</td>
</tr>
<tr>
<td>8. The only permanent sign at the street frontage would be the sign at the corner of La Jolla Scenic Way and La Jolla Village Drive.</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>LETTER</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. What is the distance between the structure of the single-family residence to the south and the property line between the two properties?</td>
</tr>
<tr>
<td>3. Is a landscape plan for the Existing with Improvements option available? If so, please include a reference here; if not, why not?</td>
</tr>
<tr>
<td>4. What sort of landscaping will be used to “shield” the adjacent property to the south?</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>BZ-101 Paragraph 6: “As shown on Figure 4.1-1, the four-foot side yard setback would be adhered to at the northern frontage of the site.”</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Which side of the property would be considered to be the “front” side?</td>
</tr>
<tr>
<td>2. What would be the street address of the Phase 2 buildings?</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>BZ-102 Paragraph 5: “Off-street parking would be provided according to standards set by the Traffic Impact Analysis (see Appendix B), which was in turn approved by the City of San Diego Development Services Department.”</th>
</tr>
</thead>
<tbody>
<tr>
<td>This does not speak to the parking plan’s conformance with the off-street parking component of the La Jolla Shores Design Manual. Which elements comply? Which do not?</td>
</tr>
<tr>
<td>This statement merely claims that off-street parking requirements set forth in an appended report have been met. It does not speak to the proposed parking plan’s specific compliance with development regulations contained in the LJS/SDC or SDMC.</td>
</tr>
<tr>
<td>Please refer to my comments regarding Page 4.2-41, Paragraph 3.</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>BZ-103 Paragraph 3: “The Design Manual states “design all curves, intersections and cul-de-sacs and their relationships to houses for the best visual effect.” The cul-de-sac along the west end of the east-west trending La Jolla Scenic Drive North would be vacated, thus providing a better visual effect.”</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. But it leaves a short sharp curve at the intersection between two street tangents, which is explicitly stated (in the same paragraph as the sentence quoted) as something to be avoided. Could the area of the ROW be used to re-align the street so that the result is a longer-radius curve?</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>BZ-104 Paragraph 4: “Other than secondary way-finding signs, the only signs envisioned by the proposed design are a ground sign integrated with the retaining wall at the corner of La Jolla Scenic Way and La Jolla Village Drive, and a wall sign identifying the building near the entrance. These signs would comply with the Design Manual and LDC.”</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Which elements of each sign comply do not comply with the sign component of the LJS/SDC?</td>
</tr>
<tr>
<td>2. What would be the copy on each sign?</td>
</tr>
<tr>
<td>3. What is the size of the wall sign near the facility’s entrance?</td>
</tr>
<tr>
<td>4. The description “ground sign integrated with the retaining wall” is confusing. Would this be considered a ground sign or a wall sign?</td>
</tr>
<tr>
<td>5. What is the size of the “ground” sign?</td>
</tr>
<tr>
<td>6. Would the “ground” sign be illuminated in any way? If so, how?</td>
</tr>
<tr>
<td>LETTER</td>
</tr>
<tr>
<td>--------</td>
</tr>
<tr>
<td>BZ-105</td>
</tr>
<tr>
<td>BZ-106</td>
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<tr>
<td>BZ-107</td>
</tr>
<tr>
<td>BZ-108</td>
</tr>
<tr>
<td>BZ-109</td>
</tr>
</tbody>
</table>
**LETTER**

<table>
<thead>
<tr>
<th>BZ-110</th>
<th><strong>4.2.3. Paragraph 4:</strong> &quot;Traffic volumes are based on daily roadway traffic counts conducted in February 2010 for the study area while UCSD and public schools were in session.&quot;</th>
</tr>
</thead>
</table>
|        | 1. Are these the same measurements as those taken for the Traffic Analysis that was used for the first draft of the EIR?  
2. 2010 was four years ago. Why weren’t new measurements taken for the new Traffic Analysis?  
3. Does four-year-old traffic data qualify as acceptable under CEQA? Why or why not? |
| BZ-111 | **4.2.7. Section: “UCSD Bicycle and Pedestrian Master Planning Study”**  
1. Why is there no discussion regarding the City’s 2013 Master Bicycle Plan? |
| BZ-112 | **4.2.7. Paragraph 3:** "Current local bus and express bus transit service is provided in the La Jolla Community via Routes 30, 41, 101, 921, and 150. A bus stop is located on the south side of La Jolla Village Drive adjacent to the project site (that is proposed to remain with either the Phase 1 or Phase 2 on the Existing with Improvements option)."  
1. Which of the routes listed stop at the project site? |
| BZ-113 | **4.2.8. Paragraph 1:** "The UCSD campus has an on-site Campus Loop Shuttle system that runs weekdays from 7:00 a.m. to midnight and weekends from 8:00 a.m. to 8:00 p.m. Frequencies of pick-ups vary by the hour of the day, and range between 10 minutes to 20 minutes. The UCSD Loop shuttles also extend further out from campus and operate as the City, Coaster, East/Regents, Hilcrest/Campus, Mesa Housing, Sanford Consortium, and Scripps Institute of Oceanography shuttles."  
1. Does the Campus Shuttle stop at the project site?  
2. Where is the nearest Campus Shuttle stop? What is its distance from the project site?  
Would passengers have a direct walk to the site from the shuttle stop or would they be required to cross major intersections? |
| BZ-114 | **4.2.8. Paragraph 2:** "In addition, shuttle service is provided to connect the University Town Center (UTC) Transit Center to UCSD via the Metropolitan Transit System SuperLoop on Routes 201 and 202 that runs an average of every 10 minutes during peak hours and 15 minutes during non-peak hours (between 5:00 a.m. and 9:00 p.m. and in the evening)."  
1. Does the SuperLoop stop at the project site?  
2. Where is the nearest SuperLoop stop? What is its distance from the project site?  
Would passengers have a direct walk to the site from the shuttle stop or would they be required to cross major intersections? |

**RESPONSE**

<table>
<thead>
<tr>
<th>BZ-110</th>
<th>New traffic counts have been provided to staff and no revisions to the TIA or Final EIR are required.</th>
</tr>
</thead>
</table>
| BZ-111 | The City’s Bicycle Master Plan Update was adopted in December 2013, which is when the recirculated EIR was released for public review. Therefore, the EIR could not have included this information.  

The project would not conflict with implementation of the bicycle routes identified in the Bicycle Master Plan Update. As previously detailed, the Update did not identify the portion of La Jolla Scenic Drive North (on the southern perimeter of the project site) as a bikeway. However, the proposed project would enhance bicycle connectivity by providing a pathway from the intersection of North Torrey Pines Road and La Jolla Village Drive. |
| BZ-112 | Route 30 stops at the bus stop adjacent to the project site. |
| BZ-113 | 1. The Campus Shuttle does not stop at the bus stop adjacent to the project site.  
2. The nearest Campus Shuttle Stop is located at Expedition Way and North Torrey Pines Road (approximately 750 feet west of the project site). The passengers would have to cross two intersections to arrive at the project site. |
| BZ-114 | 1 & 2. The nearest SuperLoop stop is located at Gilman Drive and Myers Drive, an approximate 15-minute walk from the project site that would require walking through the UCSD campus, or connecting with the MTS 30 route to the project site. |
BZ-115 4.2.9, Paragraph 4: “There are no local or national established trip generation rates for a facility such as this project. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study.”

1. The San Diego Municipal Code Land Development Code Trip Generation Manual [Rev. May 2003] (TGM) states, under “Additional Trip Generation Rates,” “in absence of other information available, these rates may be used as a reference for a similar land use elsewhere.” If this is true, why was a site-specific trip generation study undertaken?

2. Considering that the declared activities for the proposed project include religious study groups, lectures, morning prayers, meetings, student programs, general administrative functions, and social activities, why would it not be reasonable to determine possible similar uses to include:
   a) House of Worship (Without school or Day Care) [TGM, Table 1]?
   b) Library (Less than 100,000 sq. ft.) [TGM, Table 1]?
   c) Commercial Office [TGM, Table 1]?
   d) Recreation Building [TGM, Table 4]?
   e) Seminar Room/Study Hall/Office [TGM, Table 4]?

3. While the above list may not contain exact similarities in use, the survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. See also BZ-77.

Data related to the California State University was included in EIR Section 4.2.4.1(a).

BZ-116 “In addition, historical site-specific data from the existing Hillel center (both the Cliffridge property and the existing on-campus space) indicate many current patrons walk from UCSD to attend the programs held at the Cliffridge property.”

1. How would this information be relevant to the Phase 1/Phase 2 project? Phase 1 would be, as described, a temporary use. Phase 2 is proposed so that the applicant may offer a wider range of programs in a central location and would, therefore, entail more intensive use than the current Cliffridge property. Further, there is little, if any, relevance of any activities held on campus since any such locations would be, by definition, closer in proximity to classes and residence halls.

BZ-117 4.2.10, Paragraph 1: “In addition, to determine appropriate parking generation rates, surveys were also conducted at UCSD, UCLA, UCSB, and California State University, Northridge (CSUN).”

1. Why is no discussion or data provided regarding CSUN?
2. Why was CSUN discussed in the first draft of the EIR but not in the current recirculation?

BZ-118 4.2.10, Paragraph 2: “The UCSD survey collected responses from 115 students.”

1. What was the total membership (if such a word may be used) of Hillel at the time the survey was taken?
2. What percentage of the total Hillel membership did 115 students represent?
3. Appendix G1 of the Traffic Analysis shows that the survey that was undertaken was done online. Was this the only way that results were collected?
4. How were students asked to participate in the survey? Was an announcement made or a flyer handed out at events? Were members solicited to respond via email?

BZ-116 Occupancy would be limited as discussed in response to comment BZ-50. Therefore, project trips would likewise remain the same. See response to comment BZ-51.

BZ-117 1. The parking surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. See also response to comment BZ-77.

Data related to the California State University was included in EIR Section 4.2.4.1(a).

2. This information was included in all public review drafts of the EIR.

BZ-118 1-8. Responses to these specific items are not relevant to the application of the parking surveys. The parking surveys were not intended to provide detailed, scientific measurements. The survey information was gathered and used to assist the traffic engineers with the development of assertions that could be the basis for determining an adequate amount of parking relative to the proposed project. See also BZ-55.
5. Sample Validity relies on the fundamental principle of probability sampling, wherein each respondent has an equal chance at being selected by random. Online surveys rely on the respondent to actively choose to participate by making the effort to navigate to the website, leading to a bias known as self-selection. What measures were taken to ensure that the probability of the sample used presents a statistically valid representation of Hillel visitors?

6. Self-Selection has been known to skew data because those who actively choose to respond to online surveys are more likely to be interested in or enthusiastic about the subject or have a vested interest in the outcome. What measures were taken to elicit responses from members whose interest is more passive than those who are fully engaged?

7. Over-sampling can occur when the identity of respondents cannot be verified as unique. What measures were taken to limit or reduce the incidence of a single individual responding more than once?

8. Why should it be reasonable to base assumptions made in a technical analysis on data whose acquisition methodology is suspect?

"The results of this survey found that approximately 80 percent of the students stated that they would walk to the Hillel facility at its proposed location."

1. In reviewing the data presented in Appendix C1 of the Traffic Analysis, it appears that the survey question related to likely methods to attend the facility is Question 7. Is this correct?

2. Totaling the counts from either column yields a number that is significantly greater than the 115 respondents, suggesting that the question method (at least for this question) was of the "check any that apply" variety. Is this, indeed, the case?

3. The 80% figure appears to be derived from the "Day Program" column by totaling the counts of all answers except the first ("Drive to facility and park in parking lot at Hillel center":
   - [Responses of "Other" are ignored for lack of detail provided.]
   - (26 + 42 + 60 + 21) / 183 = 0.814

Is this correct?

4. While the applicant contemplates many day-time programs, the facility’s hours are stated to be 8 a.m. to 10 p.m., meaning that as many as five hours of each day (more than 30% of the facility’s daily hours of operation) would be in the evening. Why were counts from the "Evening Program" column not included in this calculation?

5. By applying the above method to both sets of data, wouldn’t it be more correct to claim 70% (rounding the figure to the nearest 10, as was done before) instead of 80%?
   - [Responses of "Other" are ignored for lack of detail provided.]
   - ((26 + 42 + 60 + 21) + (17 + 36 + 30 + 9)) / (183 + 162) = 0.724

6. Are the choices presented in the question atomic—meaning that using one mode of transportation would preclude the use of all others (e.g., someone who drove to the center could not also claim to have walked)?

7. Considering the "check any that apply"-style of the question, would it be fair to consider that a respondent who indicated multiple modes of transportation might use one mode some of the time and another mode at other times?

8. Would it be fair to say that decisions regarding which mode of transportation to use would likely be based on an undefined number of parameters (weather, personal schedule, convenience, etc.), thus making it impossible to determine with any certainty how often a respondent would select one mode over another?
9. Considering that multiple respondents recorded multiple answers to both "Day Programs" and "Evening Programs," the atomic nature of the choices, and that no conclusions can be made regarding a respondent's propensity to choose one mode of transportation over another, it is more accurate to interpret the data as a series of possible maximums:
   ○ [Responses of "Other" are ignored for all calculations due to lack of detail provided.]
   ○ As many as 34 students (30%) would drive to the facility during the day
     - 34 students / 115 students = 0.296
   ○ As many as 61 students (53%) would drive to the facility during the evening
     - 61 students / 115 students = 0.530
   ○ As many as 26 students (23%) would drive to campus and walk to the facility during the day
     - 26 students / 115 students = 0.226
   ○ As many as 17 students (15%) would drive to campus and walk to the facility during the evening
     - 17 students / 115 students = 0.148
   ○ As many as 42 students (37%) would take the campus shuttle and walk to the facility during the day
     - 42 students / 115 students = 0.365
   ○ As many as 36 students (31%) would take the campus shuttle and walk to the facility during the evening
     - 36 students / 115 students = 0.313
   ○ As many as 80 students (52%) would walk to the facility during the day
     - 80 students / 115 students = 0.522
   ○ As many as 39 students (34%) would walk to the facility during the evening
     - 39 students / 115 students = 0.339
   ○ As many as 21 students (18%) would bike to the facility during the day
     - 21 students / 115 students = 0.183
   ○ As many as 9 students (8%) would bike to the facility during the evening
     - 9 students / 115 students = 0.0783
Would it not be more appropriate to conservatively base traffic projections and parking requirements for a site-specific survey on projected maximums as calculated above? Why or why not?

10. Question 5 in the survey indicates that 43 respondents (36%) have UCSD parking permits, yet Question 3 indicates that as many as 48 respondents drive to campus, suggesting that as many as 5 respondents (10%) drive to school, but do not park on the campus proper.
   - (48 Q3 drivers – 43 permit holders) / 48 drivers = 0.104
   Would it be a reasonable assumption that such drivers park near campus (such as on nearby streets)?

11. Question 3 appears to be a "check any that apply" question, given that the count totals exceed the number of respondents, making the resulting counts possible maximums rather than straightforward methods for getting to school. Further, the screenshot also shows that 94 survey-takers responded to the question while 27 did not. Considering this, would not any or all of the counts collected increase if more responses had been collected for this question?

12. Factoring in the potential increase to the number of students responding that they drive (and adjusting for the 2 respondents who did not answer Question 5), would it be fair to say that the range of potential drivers to campus who do not own parking permits is 5–30 respondents (10%–41% of potential drivers)?
LETTER

13. Question 7 does not have a choice like "Park on a nearby street and walk to the Hillel center," is it possible that some of the respondents who chose either "Walk" or "Drive to campus and walk to Hillel" belong to the pool of respondents who potentially drive to campus but park on nearby streets?

BZ-120

- Of the 20 percent that suggested they would drive to the facility, just over half of those students responded that they would carpool.

- This is not correct. Question 8 of the UCSD survey (Traffic Analysis, Appendix G1) asks about carpooling in relation to driving to the UCSD campus, not to the project site. The data does not provide a direct correlation between carpooling to the campus and carpooling to the proposed facility. A respondent who carpools to campus (say, with a neighbor) could just as easily drive alone or walk to the facility.

BZ-121

4.2-10, Paragraph 3: "The survey and parking demand count conducted in March 2010 was conducted over the course of a week with a sample size of 40 to 50 students depending on the day data was collected. Data was collected on program attendance, mode of transportation to the site, and parking occupancy counts."

- What was the total membership of the UCLA Hillel at the time the survey was taken?
- What percentage of the total UCLA Hillel membership do the samples represent?
- The data collected on the Transportation Questionnaires (Traffic Analysis, Appendix G2) appears to have been conducted as a group poll for each event. Is this correct?

BZ-122

- Of the students driving to the site, 100 percent of those trips were carpool trips.

  1. The Transportation Questionnaire (Traffic Analysis, Appendix G2) for the "Chair Regular Class (March 2, 2010 at 6 p.m.)" appears to show a single driver in attendance. Considering this, how can the claim be made that 100 percent of the driving trips comprised car pools?
  2. The Transportation Questionnaire for "Staff Meeting (March 4, 2010 at 10 a.m.)" appears to indicate 11 respondents drove and that each was the driver. No indication is given regarding the number of cars that were used. How was this factored into the carpool calculation?

BZ-123

4.2-10, Paragraph 4: "For example, when 12 staff are on-site at the facility, 12 parking spaces were counted as occupied, indicating that the facility has an adequate parking supply."

- Earlier in the paragraph it is stated that the UCLA facility has 13 parking spaces. Given this, how can the above statement be considered true when the data from the Occupancy Use Surveys (Traffic Analysis, Appendix G2) shows that on three days in excess of 13 cars (as many as 19 on March 4, 2010) were recorded in the parking lot?

BZ-124

4.2-10, Paragraph 5: "The UCSB Hillel is located just off campus (approximately two to three blocks) in the Isla Vista community, which is predominately a student housing area."

RESPONSE

BZ-120

See response to comment BZ-118.

BZ-121

1-3. See response to comment BZ-118.

BZ-122

1-2. See response to comment BZ-118.

BZ-123

See response to comment BZ-118.

BZ-124

See response to comment BZ-118.
LETTER

1. A survey of the area through Google Streetview shows that the majority of properties surrounding the UCSB Hill site are multi-unit apartment buildings and fraternity/sorority houses. How does this compare to the project site in question?

BZ-125

4.2-11, Paragraph 3: "Based on information provided by the applicant, it is expected that with Phase 1/Phase 2, a typical Hill site program would draw between 10 and 30 students and, at most, 50 patrons to the site."

1. The Event Log for Winter 2010 (Traffic Analysis, Appendix E) is four years old and many of the activities and attendances could have changed since then. Could more recent data be provided?

BZ-126

"However, for the purpose of being conservative in the trip generation assumptions for this report, a maximum of 100 persons were assumed to arrive at the project site during the peak timeframe of programs and events at the facility, which would be expected to occur midday between 10:00 a.m.-2:00 p.m."

1. The Event Log for Winter 2010 does not contain times, while the calendar sheets show an average of 6-7 activities each week, with only two activities—"Mondays with ..." (11 a.m., Mondays) and "Weekly ..." (11:30 a.m., Wednesdays)—regularly falling within the 10 a.m.-2 p.m. timeframe. How can the "peak timeframe of programs and events" be judged by the data provided in the Event Logs or the calendar sheets provided?

BZ-127

4.2-11, Paragraph 4: "A historical monthly program guide was provided by the applicant indicating the dates and times of the social events to be held at the proposed facility."

- A historical guide cannot list dates and times that will be held in the future. Please revise sentence to indicate that the guide is being used as a model for future activities.

1. The calendar pages (Traffic Analysis, Appendix E) show only a fraction of the activities listed in the Event Log. For example, the Event Log lists 18 activities for the week spanning Monday, January 18 to Sunday, January 24 (14 located on-site while the calendar lists 7 activities location not listed)—including one event, "Mondays with ..." (11 a.m., Monday, January 18) that is not included on the Event Log. How were the times of events determined when the majority (those listed in the Event Log) do not have times listed?

BZ-128

4.2-11, Paragraph 5: "The three surveys estimated that 87 percent of students currently walk or would walk to reach the facility."

- See comments for Page 4.2-10, Paragraph 2 regarding the flawed analysis of the data collected by the UCSD survey.

1. This number appears to be an average of the percentages claimed to be reported by the student surveys conducted at UCSD (85%), UCLA (56%), and UCSB (84%). Is this correct?

\[
\frac{80 + 53 + 84}{3} = 86.6
\]

2. Given that transportation patterns depend on many factors besides similarity of programming (e.g. terrain, availability, cost, and proximity of housing, availability and...
BZ-129

"Based on the surveys and as a conservative measure, it was assumed that 80 percent of patrons would walk to the site and 20 percent would drive."

- See comments for Page 4.2-10, Paragraph 2 regarding the flawed analysis of the data collected by the UCSD survey.
- How can this assumption be described as conservative when the "results" of the UCSD survey relies only on "Day Program" data and ignores data collected regarding "Evening Program" transportation mode rates?

BZ-130

"Of those 20 percent driving to the site, it was assumed the average vehicle occupancy would be two persons per vehicle, based on the survey data collected for UCLA and UCSD."

- See comments for Page 4.2-10, Paragraph 2 regarding the flawed analysis of the data collected by the UCSD survey.
- Given that Page 4.2-10, Paragraph 2 claims that approximately 50% of drivers would carpool, how can the above assumption (which assumes a carpool rate of 100%) be made?

BZ-131

4.2-12. Paragraph 4: "In addition, Phase 1/Phase 2 would be conditioned to install a stop sign on the Caminito Deseo approach to this intersection."

1. Caminito Deseo is a private street and the land to either side is privately owned by a Homeowner's Association. Has the HOA been consulted regarding this condition?
2. What are the details of this contact (date, resulting outcome of any meetings, etc.)?
3. How can one private development project impose a condition on the private property of a nearby, non-adjacent parcel of land?
4. What effect would this condition have on the Traffic Analysis and the project as a whole?

BZ-132

4.2-15. Paragraph 8: "The City requires other reasonably foreseeable projects in the nearby area to be included in the near-term analysis in order to account for projects that could be reasonably expected to be open and operating by the project's expected opening day in Year 2015 (but after existing counts were taken in February 2010)."

1. Given the remaining portion of the project approval process and that construction is estimated to take approximately 12-18 months, is this opening date in 2016 realistic?
2. If not, why hasn't the timeframe for near-term cumulative project impacts been adjusted accordingly?

BZ-133

"Development projects in the nearby area were included in the near-term traffic volume forecast."

BZ-129 Please see responses to comments BZ-55 and BZ-115.

BZ-130 Please see responses to comments BZ-55 and BZ-115.

BZ-131 The installation of a stop sign was only a recommendation by the traffic engineer to increase safety at the intersection. If the property owner does not wish to install the stop sign, it would not be enforced.

The analysis assumes all 128 homes utilize Caminito Deseo to reach La Jolla Scenic Drive North.

BZ-132 The opening day is now expected to be around 2016–17. There are no additional approved cumulative projects that would need to be added in addition to the 16 projects already included. A growth factor was included in the traffic study cumulative analysis to account for any unanticipated growth.

BZ-133 General enrollment increases at existing schools do not qualify as cumulative projects. However, a growth factor was included in the traffic study cumulative analysis to account for any unanticipated growth.
BZ-134

4.2-21, Paragraph 4: “Venter Institute is located at the southwest corner of the intersection of La Jolla Village Drive and Torrey Pines Road as part of the UCSD campus.”

- Please consider that the UCSD LROP projects three additional research buildings north of the Venter Institute, between Torrey Pines Road and Expedition Way.

BZ-135

4.2-41, Paragraph 3: “Currently, no specific parking minimum or maximum requirements exist for this type of facility in the City’s Municipal Code (see Chapter 14, Article 2, Division 5).”

1. What, specifically, is the “type” of facility being proposed? What is the specific use of the Phase 2 project that cannot be found in the City’s Municipal Code?

2. The Traffic Analysis relies on a “historical monthly program guide” (Event Log from Winter 2010, Traffic Analysis, Appendix E) as the basis to determine the activities that will take place within Phase 2 facility. Would it be correct to say that this would be the case?

3. The Event Log from Winter 2010 (Traffic Analysis, Appendix E) lists numerous events flagged as “Y” in the column labeled “Hillside House Y or N.” Is the Hillside House referred to in this log the same as the Cliffridge property?

4. Wouldn’t this appear to indicate that the use of the Phase 2 project would not be dissimilar to the Cliffridge property?

5. If the uses for Phase 2 and the Cliffridge property are similar, why are the parking requirements for Phase 2 and the Existing with Improvements option calculated differently? Doesn’t this an inconsistency in the application of development regulations?

6. SDMC 142.0520 (f) says, “Unspecified Uses. For uses not addressed by Tables 142- DSE, 142-DSE, and 142-093 the required off-street parking spaces are the same as that required for similar uses.” Further, LBSPOD 1510.0304 (f) (2) states, “Where ambiguity exists in the application of these off-street parking requirements or where any use not specified is found to be a permitted use, the off-street parking requirements shall be consistent with that for similar uses in the La Jolla Shores Planned District.” Why do these sections not apply to this project?

7. The Oxford dictionary defines the word “similar” as “ressembling without being identical,” meaning that the facility’s use only has to share a likeness with a use listed in the San Diego Municipal Code, not be exact match. Would this be a fair and reasonable interpretation?

8. A brief glance through SDMC Table 142-0520 “Parking Ratios for Specified Non-Residential Uses,” reveals several uses that meet the definition of similar to varying degrees:
   - Churches and places of religious assembly
   - Vocational/trade schools
   - Exhibit Halls & Convention Facilities
   - Public assembly & entertainment (Other)
   - Private clubs, lodges, fraternal organizations (except fraternities and sororities)
   - Business & professional offices

The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section 4.2.3.1(a) and Chapter 7 for analysis that includes this project.

Access to and from the Venter Institute is discussed in Section 4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (full access driveway). Access from Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

The cumulative traffic analysis (see Section 4.2.3.2[a], specifically Figures 4.2-8 and 4.2-9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, it was concluded that the Phase 1/Phase 2 project would not contribute to a cumulative traffic impact to street segments and intersections.

1. The project entails a facility that would be used primarily for religious purposes. See response to comment BZ-44

2. See response to comment BZ-51.

3. See response to comment BZ-76.

4. See response to comment BZ-4 relating to current use of the Cliffridge property.

5. The Existing with Improvements Alternative is a much smaller scale use than the Phase 1/Phase 2 project, and more akin to office use than the Phase 1/Phase 2 project. Parking is calculated using the same formula as the proposed but at a smaller scale.

6-11. See response to comment BZ-55.
Why would none of these be considered “similar” in use to the proposed facility?

9. It could be argued that none of the uses listed in the San Diego Municipal Code match that of the proposed facility because the variety of activities planned for the facility transcend more than a single listed use. Is that the case here? Why or why not?

10. If more than one use applies, would this trigger the requirements in SDMC 142.056G (a) (2), which says: “For mixed uses on the same premises, the required parking spaces shall be either of the following: (A) The sum of the requirements for each individual use computed separately; or (B) In compliance with Section 142.0545 shared parking requirements?” Why or why not?

11. Footnote 4 for Table 142-05G says, “On-site accessory retail sales, commercial services, and office uses that are not open to the public are subject to the same parking ratio as the primary use.” Does this mean that in order for a use to be deemed accessory that a primary use must be determined?

BZ-136  1-5. See responses to comments BZ-44 and BZ-55.

1. The above statement makes claim that the project is not a church or place of religious assembly as defined in the Municipal Code. Does such a definition exist? If so, where?

2. Section 3.1 of this recirculated draft of the EIR indicates that “relief would implement its religious mission to foster Jewish principles of spirituality, community building, and community service by providing a permanent religious learning and gathering space for Jewish students attending UCSD through the construction of the Phase 1/Phase 2 project.” Why would a “religious learning and gathering space” not be considered a place of religious assembly?

3. Several of the proposed regular weekly activities, such as morning prayer, services and Torah/Talmud study mentioned in Section 3.4.2.1.a, are the very characterization of “religious assembly.” Considering that the facility seeks “to provide religious programs” and that one of the buildings, referred to in Section 3.4.2.1.c as the “Library/Chapel,” “would be used for Torah and Talmud study classes and for small services.” Considering this, why should the project not be considered a place of religious assembly?

4. Is the argument here that “Churches and places of religious assembly” requirements cannot be applied because the Phase 1/Phase 2 facility does not include pews or permanent seats?

5. Per SDMC Table 142-05G, the requirement for “Churches and places of religious assembly” are “1 per 3 seats; or 1 per 60 inches of pew space; or 30 per 1,000 square feet assembly area if seating is not fixed.” Since Phase 2 would not have pews or “permanent seats,” why wouldn’t the third requirement, 30 space per 1,000 sf assembly area, not apply?

BZ-137  1-5. Parking regulations apply to the project. It is not exempt. See response to comment BZ-55.

Under such circumstances, the City and industry standard is to estimate parking demand based on information for existing comparable facilities.

1. SDMC 142.0505 “When Parking Regulations Apply” states: “These regulations apply in all base zones and planned districts, with the exception of those areas specifically identified as being exempt from the regulations, whether or not permit or other approval is required.” Is the project site in an area specifically identified as being exempt? Why or why not?
1. The previous recirculated EIR (January 2013) did not include red-lining or underlining, nor did the current recirculated EIR (December 2013). The Preface to the recirculated EIR in both versions provided an overview of the revisions made to each document. The Preface states:

Section 15088.5(g) of the CEQA Guidelines requires a summary of the revisions made to the previously circulated Draft EIR. The following is a summary of the environmental analysis revisions completed.

Planned development projects within the vicinity of the project site have been added to Chapter 7, Cumulative Impacts. The traffic impact analysis and other environmental issues have been revised as applicable.

Additional information includes a construction traffic analysis, an updated biological survey, an updated analysis on the potential for on-site generated noise, and further clarification of the Phase 1/Phase 2 project (such as the size of the street vacation, street dedication, easements, and lot coverage).

Therefore, the recirculated EIR complied with the requirements under CEQA with regards to the recirculation of the EIR.

2. The project name was revised to clarify the facilities primary use.

See response to comment BZ-44.

3. Responses to comments received on all three public review EIRs are included in the Final EIR.

Pursuant to CEQA Guidelines Section 15088.5, an EIR should be recirculated when "significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term 'information' can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect." The EIR was recirculated consistent with the CEQA Guidelines.

5. Regulations pertaining to supplemental or subsequent EIRs are not relevant to this document.
 LETTER

7. Does the inclusion of the additional project show any additional substantial impacts or a substantial increase in the severity of impacts already identified?
8. One of the additions to the recirculated drafts was the inclusion of the technical appendices for Traffic Analysis (Appendix B, Part 2). Why was this information not included in prior versions of the EIR? Why did it take so long to produce it?
9. While the recirculation includes a revised traffic impact analysis, the data used to generate the report remains based on information gathered in 2010 (four years ago, as of the writing of this response). Why should this information be considered new?
10. What is the justification for producing a new biological survey? What significant new information came to light to prompt this?

 RESPONSE

BZ-140 1-3. The commenter refers to CEQA Guidelines Section 15108, but that provision does not divest the agency of jurisdiction to complete environmental review. The time to complete and certify an EIR is directory, and not mandatory. The agency has discretion to extend the time period to complete review for compelling circumstances and agreement by the applicant. See e.g., Cal. Pub. Res. Code § 21151.5(a)(4). Here, the additional time is the product of, among other things, recirculation of the Draft EIR, the volume of public comments received, including the 462 comments submitted by the current commenter, and the time required to prepare thorough responses to the public comments. Such additional time is permitted under CEQA.

6. Because the projects were not included in prior drafts of the EIR, they constitute “new information” relative to the analysis in the second recirculated EIR.
7. No additional impacts were identified as a result of the additional cumulative projects.
8. The technical appendices to the Traffic Impact Analysis were mistakenly omitted during the prior review period.
9. The Traffic Impact Analysis was updated in order to provide a traffic analysis associated with construction of the Phase 1/Phase 2 project.

10. The City of San Diego requires that biological surveys be updated periodically due to the dynamic nature of the biological environment. There was no change in the conclusion from the previous recirculated EIR, which concluded that impacts would be less than significant with the implementation of mitigation.
Ideally, the independent variable that has the strongest logical relationship with trip-making, and that can be measured or estimated to sufficient accuracy, should be selected. For example, for an office building, gross square feet is typically a better independent variable than is overall site acreage. However, it is also important to evaluate the sample size for each independent variable. In the case of two variables with similar measures of "best fit," the analyst should usually favor the most accurately projected variable. If there appears to be little difference, then the variable with the larger sample size should be selected.

The chosen independent variable should be stable for a particular land use type and not a direct function of actual site tenants. The values and measurements attributable to an independent variable should not change dramatically with changes in building tenants. Physical site characteristics (such as square feet of floor area or number of dwelling units) are preferable to tenant characteristics (such as employees or residents).

Finally, a selected independent variable should be obtained through a primary measurement, not derived from secondary data. For example, many estimates of the number of employees working in a commercial building are derived as a function of the floor area (in square footage) of the office building and an assumed employment density. An estimate of trips based on an independent variable derived using this approach is not likely to be as accurate as one based on primary data. Nevertheless, if the selected independent variable must be derived rather than measured, the analyst should apply a realistic and credible factor based on verifiable or valid relationships applicable to the site being considered.
4.3 Basis for Recommended Process

The recommended approach for using information from *Trip Generation Manual* data pages to estimate trip generation for a study site is based on the following statements:

- The value of the independent variable for the study site must be within the range of data included to use the data plot;
- When the data plot has at least 20 data points and a fitted curve equation are provided, the fitted curve equation should be used;
- A fitted curve equation with an $R^2$ of at least 0.75 is appropriate to use because it indicates the recommended acceptable level of correlation between trips generated by a site and the value measured for an independent variable;
- A weighted average rate is appropriate to use when the weighted standard deviation is less than or equal to 55 percent of the weighted average rate;
- The use of supplemental local data is suggested when the data plot has fewer than six data points; and
- The number of trips determined by either the rate or the equation should be within the cluster of data points (that is, the range of trip values) found at the study site's independent variable value. Otherwise, collecting and using additional local data is suggested.

A detailed step-by-step approach for using *Trip Generation Manual* data is presented in Section 4.4 of this chapter.

4.4 Process for Selecting Average Rate or Equation in *Trip Generation Manual* Data

A step-by-step procedure is described below for determining how best to estimate trip generation using data contained in *Trip Generation Manual*. These guidelines are merely tools to help the analyst estimate trip generation. These tools are by design straightforward and uncomplicated. They do not include all considerations that could be relevant to a particular situation. Thus, professional judgment must be applied at all stages in this analysis process. The procedure is also outlined with simplified text in the flow chart in Figure 4.2.

4.4.1—Step 1: Determine if the study site is consistent with the description of a land use code in *Trip Generation Manual* and with the described or presumed characteristics of development sites for which data points are provided.

- If the answer is yes, proceed to Step 2.
- If the answer is no, collect local data for the land use being analyzed and establish a local or consolidated rate. Refer to Chapter 9 for guidance.

4.4.2—Step 2: Determine if the size of the study site (in terms of the unit of measurement of the independent variable) is within the range of the data shown in the data plot.

- If the answer is yes, proceed to Step 3.
- If the answer is no, either (1) consider the use of a different independent variable and its associated data pages, or (2) collect local data and establish a local or consolidated rate. Refer to Chapter 9 for guidance.
Figure 4.2 Process for Selecting Average Rate or Equation in Trip Generation Manual Data

1. Is the land use code compatible with ITE land use code?
   - Yes: Size within data extremes?
     - Yes: Number of data points?
       - Yes: Fitted curve equation?
         - Yes: Use fitted curve equation
         - No: Collect local data
       - No: Standard deviation ≤ 55%?
         - Yes: Coin cluster okay?
           - Yes: Use weighted average rate
           - No: Coefficient of determination ≤ 0.75% within cluster?
             - Yes: Choose cluster
             - No: Coefficient of determination ≤ 55% within cluster?
               - Yes: Use fitted curve equation
               - No: Use weighted average rate
         - No: Collect local data
   - No: Number of data points?
     - Yes: Fitted curve equation?
       - Yes: Use fitted curve equation
       - No: Collect local data
     - No: Standard deviation ≤ 55%?
       - Yes: Coin cluster okay?
         - Yes: Use weighted average rate
         - No: Coefficient of determination ≤ 0.75% within cluster?
           - Yes: Choose cluster
           - No: Coefficient of determination ≤ 55% within cluster?
             - Yes: Use fitted curve equation
             - No: Use weighted average rate
   - No: Collect local data
4.4.3—Step 3: Determine how many data points compose the sample reported in Trip Generation Manual.

- If the number of data points is one or two, either (1) consider the use of a different independent variable and its associated data pages, or (2) collect local data and establish a local or consolidated rate. Refer to Chapter 9 for guidance.
- If the number of data points is three, four, or five, the analyst is encouraged to collect local data and establish a local or consolidated rate (see Chapter 9), but can otherwise proceed to Step 4.
- If the number of data points is six or more, proceed to Step 4.

4.4.4—Step 4: Determine if a fitted curve equation is provided.

- If the answer is yes, proceed to Step 7.
- If the answer is no, proceed to Step 5.

4.4.5—Step 5: Determine if the weighted standard deviation is less than or equal to 55 percent of the weighted average rate (calculation: the weighted standard deviation divided by weighted average rate is less than or equal to 0.55).

- If the answer is yes, proceed to Step 6.
- If the answer is no, either (1) consider the use of a different independent variable and its associated data pages or (2) collect local data and establish a local or consolidated rate. Refer to Chapter 9 for guidance.

4.4.6—Step 6: Determine if the line that corresponds to the weighted average rate is within a cluster of data points near the size of the study site.

- If the answer is yes, USE THE WEIGHTED AVERAGE RATE.
- If the answer is no, either (1) consider the use of a different independent variable and its associated data pages, or (2) collect local data and establish a local or consolidated rate. Refer to Chapter 9 for guidance.
- If there are no data points near the site size, but there are good matches at somewhat smaller and larger sizes, assume the answer is yes.

4.4.7—Step 7: Determine if there are at least 20 data points distributed over the range of values typically found for the independent variable. Determine if the line corresponding to the fitted curve equation is within the cluster of data points near the size of the study site.

- If both answers are yes, USE THE FITTED CURVE EQUATION.
- If at least one answer is no, proceed to Step 8.

4.4.8—Step 8: Determine the answers to Questions 8A and 8B.

Question 8A: Is the \( R^2 \) for the fitted curve equation greater than or equal to 0.75? And, is the line corresponding to the fitted curve equation within the cluster of data points at the size of the study site? Note: If there are no data points near the site size, but there are good matches at somewhat smaller and larger sizes, the analyst may assume the answer is yes.
Question 8B: Is the weighted standard deviation for the weighted average rate less than or equal to 55 percent of the weighted average rate? And, is the line corresponding to the weighted average rate within the cluster of data points at the size of the study site? Note: If there are no data points near the site size, but there are good matches at somewhat smaller and larger sizes, the analyst may assume the answer is yes.

If Questions 8A and 8B are both answered yes, then choose whichever line (representing either the fitted curve equation or the weighted average rate) best fits the data points at the value of the independent variable for the study site. This decision could be different for different points in the chart.

If the answer to Question 8A is yes and to Question 8B is no, then USE THE FITTED CURVE EQUATION.

If the answer to Question 8A is no and to Question 8B is yes, then USE THE WEIGHTED AVERAGE RATE.

If the answers to Questions 8A and 8B are both no, then COLLECT LOCAL DATA. Refer to Chapter 9 for guidance.

An acceptable exception to the “collect local data” recommendation occurs if the rate or equation line passes through the cluster of data at the value of the independent variable for the study site. If such is the case, the analyst may use either the weighted average rate or the fitted curve equation (whichever line is appropriate).

4.5 Examples of Recommended Process

The recommended step-by-step procedure for selecting between a weighted average rate and a fitted curve equation when estimating trip generation is illustrated by the following examples. Reference is made to data presented in Trip Generation Manual, 9th Edition.

Example 1: Estimate trip generation for Land Use Code 140 (Manufacturing) on a weekday during the afternoon peak hour of adjacent street traffic as a function of gross floor area (GFA). Assume the site will have 800,000 sq. ft. of GFA.

Step 2: size of site is within the range of data

Step 3: sufficient number of data points (56)

Step 4: fitted curve equation provided

Step 7: more than 20 data points

Use Fitted Curve Equation
ATTACHMENT 2

Near-Term Intersection Operations
### ATTACHMENT 2
**NEAR-TERM INTERSECTION OPERATIONS**

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Control Type</th>
<th>Peak Hour</th>
<th>Existing + Cumulative Projects</th>
<th>Existing + Cumulative Projects+ Project (100% Drive)</th>
<th>Δ Delay</th>
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**Footnotes:**

a. Average delay expressed in seconds per vehicle.

b. Level of Service.

c. Increase in delay due to project.

d. OWSC – One-Way Stop Controlled intersection. Minor street delay reported.

e. This intersection is currently uncontrolled. However, Caminito Deseo was analyzed as the minor street stop-controlled movement since vehicles utilizing this movement were observed to stop.

---

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Final
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for Hillel Center for
Jewish Life Project
Project Number 212995
SCH Number 2010101030

March 24, 2017
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EIR  environmental impact report
EMS  Emergency Medical Services
EMT  emergency medical technician
EO  Executive Order
EPA  Environmental Protection Agency
ESL  Environmentally Sensitive Land
FESA  Federal Endangered Species Act
FHWA  Federal Highway Administration
GHG  greenhouse gas
GWP  global warming potential
HAS  Hydrologic Sub Area
HCJL  Hillel Center for Jewish Life
HCP  Habitat Conservation Plan
HRR  Historical Resources Regulations
HVAC  heating, ventilating, and air conditioning
ICLEI  International Council for Local Environmental Initiatives
I-5  Interstate 5
IMP  integrated management practice
ITP  Incidental Take Permit kWh kilowatts per hour
LCFS  Low Carbon Fuel Standard
LDC  Land Development Code
LEED  Leadership in Energy and Environmental Design
LID  low-impact design
LJSPD  La Jolla Shores Planned District
LLG  Linscott, Law & Greenspan, Engineers
LOS  level of service
LRDP  Long-Range Development Plan
LTRP  long-term resource plan
MBTA  Migratory Bird Treaty Act of 1918
MHPA  Multi-Habitat Planning Area
MMC  Mitigation Monitoring Coordination
MMR  Mitigation Monitoring and Reporting
MMRP  Mitigation Monitoring and Reporting Program
MMTCO$_2$E  million metric tons of carbon dioxide equivalent
mph  miles per hour
MSCP  Multiple Species Conservation Program
MW  megawatt
MWh  megawatts per hour
N$_2$O  nitrous oxide
NCCP  Natural Community Conservation Plan
NOP  Notice of Preparation
NPDES  National Pollutant Discharge Elimination System
NRHP  National Register of Historic Places
OWSC  One-Way Stop Controlled (intersection)
PFFP  Public Facilities Financing Plan
PI  Principal Investigator
PM$_{10}$  particulate matter less than ten microns in diameter
PME  Paleontological Monitoring Exhibit
RE  Resident Engineer
ROW  right-of-way
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S.0 Executive Summary

S.1 Project Synopsis

This summary provides a brief synopsis of: (1) the Hillel Center for Jewish Life (HCJL) project; (2) the results of the environmental analysis contained within this Environmental Impact Report (EIR); (3) the alternatives to the project that were considered, and (4) the major areas of controversy and issues to be resolved by decision-makers. This summary does not contain the extensive background and analysis found in the document; therefore, the reader should review the entire document to fully understand the project and its environmental consequences.

The project applicant, Hillel, is organized as a 501(c)3 California nonprofit religious organization. Hillel currently uses a residential structure located at 8976 Cliffridge Avenue (Cliffridge property) to provide religious programs for Jewish students at the University of California San Diego (UCSD), including meetings, one-on-one counseling, and administrative offices.

Hillel has identified a need for additional space to improve services and provide a full range of religious programs in a centralized location for Jewish students at the UCSD campus (the project cannot be located on land owned by UCSD due to church and state separation issues). To meet this need, Hillel proposes to develop the HCJL in two phases to provide additional space for religious programs in three buildings around a central courtyard, referred to as the Phase 1/Phase 2 or as the proposed project throughout the EIR. Should the Phase 1/Phase 2 project not be approved by decision makers, an alternative to the project was also analyzed at full detail throughout the EIR. This alternative is referred to as the Existing with Improvements option. Under this alternative, Hillel would permanently use the Cliffridge property to provide for religious programs in the existing residential structure.

S.1.1 Project Location and Setting

The project site is located in the La Jolla Shores Planned District (LJS PD) of the La Jolla Community Plan area within the city of San Diego. The project site is located at the southwest corner of the intersection of La Jolla Village Drive and La Jolla Scenic Way, which is just south of UCSD. The project site includes two adjacent parcels: a 0.2-acre parcel (Assessor’s Parcel Number [APN] 344-131-0100) at 8976 Cliffridge Avenue (Cliffridge property), and a 0.8-acre vacant parcel (APN 344-120-4300).

The project site is bordered to the north by La Jolla Village Drive, to the east by La Jolla Scenic Way, and to the south by La Jolla Scenic Drive. Urban/developed land uses, roads, and ornamental landscaping comprise the dominant land cover in the area surrounding the project site. The project site has been previously disturbed as a result of past grading activities and development. Existing residences are located to the south, directly adjacent to the project site.
along La Jolla Scenic Drive North and Cliffridge Avenue, and to the east, along the east side of La Jolla Scenic Way. The project site is designated as low-density residential in the La Jolla Community Plan. The project site is located along the northern boundary of the LJSPD. According to the LJSPD Ordinance, “churches, temples, or buildings of a permanent nature, used primarily for religious purposes” are permitted uses within residential zones (Municipal Code Section 1510.0303(e) [Single-Family Zone – Permitted Uses]).

S.1.2 Project Objectives

The following are the primary objectives for the Phase 1/Phase 2 project.

- Fulfill the religious mission of the HCJL by providing a facility for learning, community-building, and spiritual counseling that nurtures the religious, spiritual, and intellectual growth of Jewish students at UCSD.

- Provide a permanent religious space in a centralized location for Jewish students at UCSD which, because of separation of church and state issues, cannot be built on the UCSD campus, but is located close to UCSD to serve students where they live and attend classes.

- Contribute to the longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses on a property owned and maintained by Hillel of San Diego (Hillel) for use by UCSD students.

- Provide a consolidated location with enough space for programs and activities and offices for religious leaders.

- Contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.

- Enhance pedestrian access, orientation, and walkability of the area surrounding the project site.

- Enhance the religious, spiritual, and community-building activities through the design and character of indoor and outdoor spaces.

- Implement the sustainable development goals through the installation of sustainable design features and building practices that would achieve optimal water conservation, on-site renewable energy, natural daylighting and ventilation, and a reduction in vehicle use through enhanced bicycle and pedestrian facilities. Exceed City goals to reduce waste and conserve regional landfill space by incorporating design measures that satisfy Leadership in Energy and Environmental Design criteria for 75 percent diversion (reuse, recycling) of construction and operational waste.
S.1.3 Project Description

The project applicant, Hillel, is organized as a 501(c)3 California nonprofit religious organization. Hillel of San Diego was incorporated in the State of California on July 1, 1992 “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. As stated in its Articles of Incorporation, Hillel’s specific purpose “…is to provide for the religious needs of Jewish students on the university campuses in San Diego County.”

Hillel currently uses the Cliffridge property for religious programs (i.e., one-on-one counseling, meetings with students, and administrative offices). Hillel has identified a need for additional space to improve services and provide a full range of religious programs.

Phase 1/Phase 2: To meet the identified objectives and need, Hillel proposes a two-phase project consisting of temporary permitting and minor upgrades to existing facilities and development of a new permanent facility composed of three buildings. The combined phases comprise the project and are referred to as Phase 1/Phase 2 in the EIR. The two phases are described below:

Phase 1 would consist of the temporary use of the Cliffridge property as a space used for religious programs until the new HCJL facilities (Phase 2) are occupied. Additional temporary parking would be constructed, but no modifications would be required to the residential structure itself.

Phase 2 would involve development of the 0.8-acre vacant parcel east of the Cliffridge property. The new facility would provide additional space for religious programs in three new buildings around a central outdoor courtyard providing 6,479 square feet of gross floor area (GFA). This does not including the “phantom floor” of the HCJL center (two stories), which is not occupiable space. A surface parking lot would be constructed east of the courtyard and structures. Landscaping and pedestrian pathways would be provided throughout, including the existing cul-de-sac between the existing residential structure currently occupied by Hillel and the vacant parcel.

Phase 2 would also involve the vacation of an unimproved portion of the existing La Jolla Scenic Drive North, a public street right-of-way (ROW), which requires approval of a street ROW vacation and vacation of an improved substandard cul-de-sac, along the west end of the east-west trending La Jolla Scenic Drive North, approximately 100 feet west of Cliffridge Avenue (which trends north-south). The purpose of the street ROW vacation is to enhance the pedestrian environment through construction of sidewalks and landscaping features. Phase 1/Phase 2 would also dedicate a 0.05-acre area along the northern property frontage to the public ROW. Section 3.4 of this EIR provides a detailed summary of the development features of the Phase 1/Phase 2 project.

All operations could then be relocated to the new facility, and expanded religious programs could be accommodated. Upon occupation of the new facilities, the temporary use of the
Cliffridge property would expire and revert back to a single dwelling unit use. The proposed building areas are outlined below in Table S-1.

**TABLE S-1**

<table>
<thead>
<tr>
<th>Proposed Gross Floor Area</th>
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<tr>
<td>HCJL Center (two stories) (including Phantom Floor*)</td>
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<tr>
<td>Library/Chapel</td>
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<tr>
<td>Professional Leadership Building</td>
</tr>
<tr>
<td><strong>Total Gross Floor Area with Phantom Floor</strong></td>
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<tr>
<td><strong>Total Gross Floor Area without Phantom Floor</strong></td>
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*Phantom floors are located within the space above or below actual floors within a building, and are measured separately above each actual floor or below the lowest actual floor for under floor area (SDMC §113.0234(b)(4)). They are not occupiable space, nor are they actual floor area.

**Existing with Improvements Option:** An option is proposed in the event the Phase 1/Phase 2 project is not approved. Under this option, Hillel would not develop new facilities or provide landscaping or an enhanced pedestrian environment as described above. Instead, Hillel would permanently use the Cliffridge property to provide for religious programs in the existing residential structure on a permanent basis. This would involve construction of permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the Municipal Code for this use. Modifications would be completed to the interior of the structure, but the existing architectural design would remain intact except for the parking improvements. This option is referred to as the “Existing with Improvements option” in the EIR.

To provide the greatest flexibility and disclosure, the Phase 1/Phase 2 project and the Existing with Improvements option are analyzed at an equal level of detail in this EIR. The components of the project are described in detail in Section 3.4, Project Features.

**S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects**

Table S-2, located at the end of this chapter, summarizes the significant effects identified during the environmental analysis completed for Phase 1/Phase 2. Table S-2 also includes mitigation measures to reduce or avoid the environmental effects, with a conclusion as to whether the impact would be mitigated to below a level of significance. The mitigation measures listed in Table S-2 are also discussed within each relevant topical area.

Standard environmental mitigation measures are proposed during the grading and construction phase to reduce adverse environmental effects related to those activities. As further discussed in Chapter 4, Phase 1/Phase 2 could result in significant, direct, and/or cumulative
environmental impacts related to biological resources, paleontology, and noise. Mitigation measures have been identified that would reduce all direct and cumulative impacts to below a level of significance. The Existing with Improvements option could result in a significant, direct environmental impact related to noise. Mitigation has been identified that would reduce this direct impact to below a level of significance. These environmental measures, in addition to further discussion of potential and anticipated environmental impacts, are detailed in Chapters 3 and 4, and further discussed in Chapters 5, 7, 8, and 9.

S.3  Areas of Controversy

In 2004, Hillel proposed the construction of an approximately 13,000-square-foot building (GFA) on the vacant 0.8-acre parcel located adjacent to the Cliffridge property and owned by Hillel. The original project included underground parking and a large community gathering space for Shabbat services and weekly Shabbat programs. The City Council approved a Mitigated Negative Declaration, Site Development Permit, Planned Development Permit, and Street Vacation for the construction of the Hillel Center in 2008. The Mitigated Negative Declaration was subsequently challenged and the Court of Appeal issued a ruling in 2009 requiring the City to prepare an EIR that would include analysis of potential impacts to traffic and parking, biological resources, and aesthetics and community character.

Several physical changes have been made to the project in response to environmental concerns and in response to nearby and residents’ concerns about the mass and scale of the project and its contemplated uses. The project was redesigned and is now proposed with three buildings totaling 6,479 square feet of GFA. The religious programs proposed for the larger facility have been re-envisioned as smaller gatherings and more directed study groups. As the proposed development is about half of the original size, parking for a smaller facility would be accommodated by a surface parking lot.

The Notice of Preparation (NOP) for the project was circulated on October 8, 2010, for a 30-day public review and comment period, and a scoping meeting was held on October 27, 2010, at the La Jolla Branch Library, 7555 Draper Avenue. The City’s NOP, associated responses, and comments made during the scoping meeting are included in Appendix A of this EIR.

Public comments received on the NOP and comments from the scoping meeting reflect controversy related to several environmental issues. Controversy associated with the project primarily focuses on the issues of zoning consistency, community character, traffic congestion and parking capacity, and nesting raptors.
S.4 Issues to be Resolved by the Decision-Making Body

Key issues to be resolved by the San Diego City Council are whether the project is consistent with City plans (General Plan and La Jolla Community Plan) and applicable regulations, including the Land Development Code and LJSPD Ordinance. The City Council will decide whether the impacts of the project have been adequately addressed and whether the significant impacts associated with the environmental issues of biology, noise, and paleontological resources would be fully mitigated to below a level of significance. The City Council must also determine whether any alternative meets the key objectives of the project while reducing its environmental impact.

S.5 Project Alternatives

To fully evaluate the environmental effects of proposed projects, the California Environmental Quality Act (CEQA) mandates that alternatives to the project be analyzed. Section 15126.6 of the State CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives.

The previously circulated EIR included a discussion of As previously discussed, this EIR considers the Phase 1/Phase 2 project and the Existing with Improvements option. Alternative throughout the document. For clarity to the reader and to provide a more comprehensive analysis of this alternative, the Final EIR has moved all discussions of at an equal level of detail, although the Existing with Improvements scenario to Chapter 9. All alternatives included therein represent CEQA alternatives pursuant to CEQA Guidelines Section 15126.6 and may be selected for approval in lieu of the proposed project. is an alternative to the project that is analyzed in full detail in case the decision makers do not approve the Phase 1/Phase 2 project. In addition, the identified in Chapter 9 are intended to further reduce or avoid significant environmental effects of the project. The EIR addresses alternatives considered but rejected, as well as the No Project Alternative, the Reduced Project Alternative, and alternate location known as the Site 675 Alternative. Each major issue area included in the impact analysis of this EIR has been given consideration in the alternatives analyses.

S.5.1 Existing with Improvements Alternative

Under the Existing with Improvements Alternative, Hillel would improve the Cliffridge property to support its continued use as a permanent learning center. These improvements would include...
the construction of a paved parking area and new driveway cut. This would allow the code violation to be removed. Impacts under this alternative would be either similar or less than the proposed project (see Table 9-1); however, this alternative would not meet most project objectives.

S.5.2 No Project Alternative

Under the No Project Alternative, the project would not go forward and the property would revert to single-family use. Existing conditions on the project site would be retained. Unlike the Phase 1/Phase 2 project, no new improvements would occur. As such, there would be no new impacts. However, the No Project Alternative would not meet major project objectives to provide a permanent religious space in a centralized location for Jewish students at UCSD; contribute to the longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses; provide a consolidated location with enough space for programs and activities and offices for religious leaders; enhance the pedestrian access, orientation, and walkability within the project site; or enhance the religious, spiritual, and community-building activities through the design and character of indoor and outdoor spaces. Furthermore, selection would not maximize use of land owned by the applicant or provide the enhanced pedestrian-environment and inviting entrance to the community as compared to the Phase 1/Phase 2 project.

S.5.23 Reduced Project Footprint on Vacant Parcel Alternative

The intention of the Reduced Project Footprint on Vacant Parcel Alternative is to decrease the on-site development footprint in order to reduce potential biological, noise, and paleontological impacts associated with the Phase 1/Phase 2 project. Under this alternative, the development footprint for new construction would be reduced to approximately 1.34 acres, and the number of new structures would be reduced from three to two (a 33 percent reduction). This alternative would be 6,099 square feet of GFA (the Cliffridge house is 1,792 square feet of GFA; on the vacant site, one building would be 2,494 square feet of GFA without the second floor, and the other would be 1,813 square feet of GFA). Compared to the Phase 1/Phase 2 project (6,479 square feet of GFA), this would represent a reduction of 380 square feet. By reducing the development footprint, this alternative would accommodate fewer people, which would reduce the parking demand, thereby requiring less surface parking than the Phase1/Phase 2 project. The reduction in parking needed under this alternative would increase the amount of open space on-site and landscaping.

This alternative involves a permanent change of use permit to convert the Cliffridge property to permanent office use for Hillel and ensure that the property meets all applicable code requirements for the intended use and occupancy. Modifications to the structure would be to the interior, and the existing architectural design would remain intact. The Reduced Project Alternative would construct two one-story buildings on the adjacent 0.8-acre parcel similar in
design and building materials as the existing residences in the area. As with the Phase 1/Phase 2 project, the cul-de-sac would be vacated and landscaped with native trees and shrubs to screen the property from the sidewalk and La Jolla Village Drive. In addition, the courtyard/inner yard area would be increased over the project and landscaped with native and drought-tolerant trees, shrubs, and groundcover. Parking improvements would be constructed in conformance with the Municipal Code and permit conditions.

This alternative would be expected to result in related incremental reductions to impacts related to energy, global climate change, noise, paleontological resources, hydrology, water quality, and visual effects/neighborhood character.

This alternative would not meet all the objectives identified for the project, nor would it provide adequate space for the multiple functions needed to support the religious growth of UCSD students. The current Phase 1/Phase 2 project, at 6,479 square feet of GFA, has already been reduced in size from earlier plans, which provided approximately 13,000 square feet of GFA. The Phase 1/Phase 2 design reflects the size that has been determined to be the minimum space needed to support Jewish students at a university the size of UCSD. Therefore, a reduced footprint would not meet a critical project objective to provide space for religious programs proposed by Hillel.

Compared to the Phase 1/Phase 2 project, the Reduced Project Alternative would incrementally reduce impacts related to energy, global climate change, noise, paleontological resources, hydrology, water quality, and visual effects/neighborhood character. Significant impacts identified for both the Phase 1/Phase 2 project and the Reduced Project Alternative would be mitigated to below a level of significance.

S.5.34 Site 675 Alternative

The intention of this alternative is to locate the proposed Hillel facilities on an alternate site—Site 675—the only vacant and available non-UCSD-owned site near the UCSD campus (the Phase 1/Phase 2 project cannot be located on land owned by UCSD due to church and state separation issues). The heavily sloping 13,400-square-foot property is located at the intersection of La Jolla Village Drive and Gilman Drive, surrounded by UCSD-owned land (see Figure 9-1).

The Site 675 Alternative would construct three buildings similar in design and scale as those of the project. In addition, the courtyard/inner yard area would be similar to the project and landscaped with native and drought-tolerant trees, shrubs, and groundcover. Under this alternative, similar to Phase 1/Phase 2, the existing residential structure at 8976 Cliffridge Avenue would be returned to its original use pending occupancy of a permanent facility for Hillel. The Site 675 Alternative would meet all of the project’s objectives; however, this alternative would result in greater physical impacts to the environment when compared to the Phase 1/Phase 2 project, including to biological resources and paleontological resources.
S.5.45 Environmentally Superior Alternative

CEQA Guidelines (Section 15126.6(e)(2)) require that an environmentally superior alternative be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative which would result in the least adverse environmental impacts to the project site and surrounding area. The Existing with Improvements option is an alternative to the project that is being analyzed throughout the EIR, and would be considered the Environmentally Superior Alternative. The Existing with Improvements option would incrementally reduce the Phase 1/Phase 2 project’s less-than-significant impacts related to biology, energy, global climate change, hydrology, water quality, noise, paleontology, and visual effects/neighborhood character. The Existing with Improvements option would also reduce the Phase 1/Phase 2 project’s significant and mitigated impacts associated with biological resources and paleontological resources. The Existing with Improvements option would have the same significant and mitigated noise impact as the Phase 1/Phase 2 project.

The Existing with Improvements option would not meet all of the project’s objectives. This alternative would not provide a consolidated location with enough space for programs and activities or offices for religious leaders; would not enhance pedestrian access, orientation, and walkability of the area surrounding the project site; would not enhance the religious, spiritual, and community-building activities through the design and character of indoor and outdoor spaces; and would not implement the sustainable development goals through the installation of sustainable design features and building practices.

While Phase 1/Phase 2 would have incrementally greater impacts, these impacts would all be reduced to below a level of significant for the project. Both the Phase 1/Phase 2 project and Existing with Improvements option require mitigation to reduce impacts to a less than significant level.
### TABLE S-2
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS FOR PHASE 1/PHASE 2 
AND THE EXISTING WITH IMPROVEMENTS OPTION

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<tr>
<th>Environmental Issue</th>
<th>Results of Impact Analysis</th>
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<th>Impact Level After Mitigation</th>
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<tr>
<td><strong>NOISE</strong></td>
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<tr>
<td>Would the project result in the exposure of people to current or future transportation noise levels, which exceed standards established in the General Plan or an adopted ALUCP?</td>
<td><strong>Interior Noise</strong> – Exterior noise levels are projected to exceed 60 Community Noise Equivalent Level (CNEL); hence, interior noise levels could exceed 45 CNEL. Interior noise impacts are potentially significant.</td>
<td><strong>NOS-1</strong>: At the time that building plans are available for the proposed buildings and prior to the issuance of building permits, a detailed acoustical analysis shall demonstrate that interior noise levels due to exterior sources will be at or below the 45 CNEL standard. Possible interior noise attenuation measures include using construction materials with greater noise reduction properties. The exterior to interior noise reduction provided by the building structure is partially a function of the sound transmission class (STC) values of the window, door, wall, and roof components used in the building. The greater the STC value, generally the greater the noise reduction. The necessary STC values required to reduce interior noise levels to 45 CNEL or less would be determined as a part of the required interior noise analysis. The applicant’s final building plans shall identify all recommendations of the acoustical report, including STC ratings of windows and doors, ventilation requirements, insulation, plumbing isolation, etc. Final building plans shall be reviewed by the City of San Diego’s Acoustical Plan Checker to verify that the mitigation measures recommended in the acoustical report have been incorporated. <strong>NOS-2</strong>: The design for the proposed buildings shall include a ventilation or air conditioning system to provide a habitable interior environment when windows are closed.</td>
<td>Less than Significant</td>
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<thead>
<tr>
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<tr>
<td><strong>BIOLOGICAL RESOURCES</strong></td>
<td><em><em>Cooper’s hawk</em> (<em>Accipiter cooperii</em>) is a CDFG species of special concern that could potentially occur on or adjacent to the project site. Because clearing and construction activities associated with Phase 1/Phase 2 could be disruptive to raptors, including Cooper’s hawk, and breeding or nesting birds, direct and indirect construction project impacts would be significant.</em>*</td>
<td><strong>BIO-1:</strong> To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey within 300 feet of proposed construction to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City Development Services Department for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City’s Biology Guidelines and applicable state and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City Development Services Department for review and approval and implemented to the satisfaction of the City. The City’s Mitigation Monitoring Coordination Section or Resident Engineer (RE), and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the precon survey, no further mitigation is required.</td>
<td>Less than Significant</td>
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TABLE S-2
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS FOR PHASE 1/PHASE 2
AND THE EXISTING WITH IMPROVEMENTS OPTION
(continued)

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<tr>
<td>PALEONTOLOGICAL RESOURCES</td>
<td>Would the project require over 1,000 cubic yards of excavation at a depth of 10 feet or greater in a high resource potential geologic formation or require over 2,000 cubic yards of excavation at a depth of 10 feet or greater in a moderate resource potential geologic formation?</td>
<td>Because of both the moderate and high sensitivity potential areas for paleontological resources, project grading could potentially destroy fossil remains, resulting in a significant impact to paleontological resources.</td>
<td>PALEO-1: The project shall follow the procedures outlined below as a condition of approval for Phase 1/Phase 2.</td>
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</table>

I. Prior to Permit Issuance
   A. Entitlements Plan Check
      1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD ED shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

   B. Letters of Qualification have been submitted to ADD
      1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines.

      2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.

      3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction
   A. Verification of Records Search
      1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but
TABLE S-2
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS FOR PHASE 1/PHASE 2
AND THE EXISTING WITH IMPROVEMENTS OPTION
(continued)

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<td>is not limited to, a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.</td>
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<td>2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.</td>
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<td>B. PI Shall Attend Precon Meetings</td>
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<td>1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the CM and/or Grading Contractor.</td>
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<tr>
<td>a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM, or BI, if appropriate, prior to the start of any work that requires monitoring.</td>
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<td>2. Identify Areas to be Monitored</td>
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<td>a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored, including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).</td>
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TABLE S-2
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<td>3. When Monitoring Will Occur</td>
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<td>a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.</td>
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<td>b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.</td>
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III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, Occupational Safety and Health Administration safety requirements may necessitate modification of the PME.

2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition, such as trenching activities, does not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
### TABLE S-2
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS FOR PHASE 1/PHASE 2
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<td>3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR’s shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.</td>
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**B. Discovery Notification Process**

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or e-mail with photos of the resource in context, if possible.

**C. Determination of Significance**

1. The PI shall evaluate the significance of the resource.

   a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.

   b. If the resource is significant, the PI shall submit a Paleontological Recovery Program and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
### TABLE S-2
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AND THE EXISTING WITH IMPROVEMENTS OPTION
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<td>c.</td>
<td>If the resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils), the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.</td>
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<td>d.</td>
<td>The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.</td>
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### IV. Night and/or Weekend Work
A. If night and/or weekend work is included in the contract:

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Preconstruction Meeting.

2. The following procedures shall be followed.

   a. No Discoveries

      In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8 A.M. on the next business day.

   b. Discoveries

      All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
TABLE S-2
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS FOR PHASE 1/PHASE 2
AND THE EXISTING WITH IMPROVEMENTS OPTION
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<tr>
<td>c. Potentially Significant Discoveries</td>
<td>If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.</td>
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<td>d. The PI shall immediately contact MMC, or by 8 A.M. on the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</td>
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B. If night work becomes necessary during the course of construction:
   1. The CM shall notify the RE, or BI as appropriate, a minimum of 24 hours before the work is to begin.
   2. The RE or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

V. Post Construction
   A. Preparation and Submittal of Draft Monitoring Report
      1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.
      a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
### TABLE S-2
SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS FOR PHASE 1/PHASE 2 AND THE EXISTING WITH IMPROVEMENTS OPTION
(continued)

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<tr>
<td>b. Recording Sites with the San Diego Natural History Museum</td>
<td>The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City’s Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.</td>
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2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Monitoring Report to MMC for approval.

4. MMC shall provide written verification to the PI of the approved report.

5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

### B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.

2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.
### TABLE S-2
**SUMMARY OF SIGNIFICANT ENVIRONMENTAL ANALYSIS RESULTS FOR PHASE 1/PHASE 2 AND THE EXISTING WITH IMPROVEMENTS OPTION**
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| C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification | 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.  
2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC. | | |
| D. Final Monitoring Report(s) | 1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative) within 90 days after notification from MMC that the Draft Monitoring Report has been approved.  
2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution. | | |
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<td>Would the project result in the exposure of people to current or future transportation noise levels, which exceed standards established in the General Plan or an adopted ALUCP?</td>
<td><strong>Interior Noise</strong>—Exterior noise levels are projected to exceed 60 CNEL; hence, interior noise levels could exceed 45 CNEL. Interior noise impacts are potentially significant.</td>
<td><strong>NOS-3</strong>: Prior to the issuance of building permits, a detailed acoustical analysis shall demonstrate that interior noise levels within the Cliffridge property due to exterior sources would be at or below the 45 CNEL standard. Possible interior noise attenuation measures include using windows and doors with greater noise reduction properties, installing insulation, or isolating plumbing components. The exterior to interior noise reduction provided by the building structure is partially a function of the STC values of the windows and doors used in the building. The greater the STC value, generally the greater the noise reduction. The necessary STC values required to reduce interior noise levels to 45 CNEL or less, which may range from STC 25 to STC 35 for window and door components, would be determined as a part of the required interior noise analysis. The applicant’s final building plans shall identify all recommendations of the acoustical report, including STC ratings of windows and doors, ventilation requirements, insulation, plumbing isolation, etc. Final building plans shall be reviewed by the City’s Acoustical Plan Checker to verify that the mitigation measures recommended in the acoustical report have been incorporated.</td>
<td>Less than Significant</td>
</tr>
<tr>
<td></td>
<td><strong>NOS-4</strong>: The design for the buildings shall include a ventilation or air conditioning system to provide a habitable interior environment when windows are closed.</td>
<td></td>
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</tr>
</tbody>
</table>
1.0 Introduction

This Environmental Impact Report (EIR) for the University of California San Diego (UCSD) Hillel Center for Jewish Life Project (HCJL; project) has been prepared by the City of San Diego (City) in compliance with the California Environmental Quality Act (CEQA) and Guidelines (Public Resources Code, Section 21000 et seq. and California Code of Regulations, Title 14, Section 15000, et seq.), and in accordance with the City’s Environmental Impact Report Guidelines (2005) and Significance Determination Thresholds (2011).

The project site includes two parcels: a 0.2-acre parcel (Assessor’s Parcel No. [APN] 344-131-0100) at 8976 Cliffridge Avenue (Cliffridge property), and a 0.8-acre vacant lot (APN 344-120-4300). The site is bounded to the north by La Jolla Village Drive, to the east by La Jolla Scenic Way, and to the south by La Jolla Scenic Drive North. Hillel of San Diego (Hillel) currently uses the Cliffridge property for administrative offices and one-on-one counseling and meetings with students, but requires additional space for religious programs. Permanent use of this facility would require on-site parking. In addition, Hillel requires additional space to provide a full range of religious programs.

The project applicant, Hillel, proposes to develop the project in two phases to provide additional space for religious programs in three buildings around a central courtyard. This is referred to throughout the EIR as the Phase 1/Phase 2 project. The Cliffridge property would provide temporary office space while the new facilities are being constructed. Upon occupancy of the HCJL, the temporary use of the Cliffridge property would cease and the property would revert to a single dwelling unit use.

The previous version of this EIR included the analysis of an alternative option to the proposed project, the Existing with Improvement Alternative. As an alternative to the proposed Phase 1/Phase 2 project, the Cliffridge property would be converted to permanent use for Hillel under an option referred to as Existing with Improvements. The Existing with Improvements option is analyzed throughout this the body of the EIR. In order to clarify that the Phase 1/Phase 2 proposal is the project proposed for approval by the decision makers, all discussions and analysis related to The Existing with Improvements option Alternative have been compiled into Chapter 9.0 (Project Alternatives) of the EIR. This alternative was already included within Chapter 9.0; however many details contained in the sections of Chapter 4.0 have been added verbatim to the alternatives analysis. would involve converting this temporary space into a permanent use, which would require on-site parking. Both the Phase 1/Phase 2 project and Existing with Improvements option are being analyzed at an equal level of detail in this EIR.

Discretionary actions required to implement Phase 1/Phase 2 include the approval of a site development permit (SDP) for development within the La Jolla Shores Planned District (LJSPD), and a right-of-way (ROW) vacation to vacate a portion of the La Jolla Scenic Drive North, and a
deviation from parking requirements. A deviation for driveway curb cut requirements is also requested under the SDP.

Discretionary actions required to implement the Existing with Improvements option include a SDP for development within the LJSPD. A deviation from the Maximum Paving and Hardscape in Residential Zones Requirement is also requested under the SDP. A detailed project description and discussion of required discretionary actions is contained in Chapter 3, Project Description.

1.1 EIR Purpose and Intended Uses

1.1.1 EIR Purpose

The purpose of this EIR is to:

- Inform decision-makers and the general public of the potential environmental consequences that may result from the approval and implementation of the project; and to

- Identify mitigation measures and project alternatives that are available to avoid or reduce potential significant environmental impacts.

1.1.2 Intended Uses of the EIR

The EIR is informational in nature and is intended for use by City decision makers; other responsible, trustee, or interested agencies; and the general public in evaluating the potential environmental effects, mitigation measures, and alternatives of the project. This EIR provides detailed information about the potential significant adverse environmental impacts of the project. By recognizing the environmental impacts of the project, decision makers will have a better understanding of the physical environmental changes that would accompany the approval of the project. The EIR includes recommended mitigation measures which, when implemented, would substantially lessen or avoid significant effects of the project on the environment, whenever feasible. Alternatives to the project are presented to evaluate alternative development scenarios that can further reduce or avoid significant impacts associated with the project.

1.2 EIR Legal Authority

1.2.1 Lead Agency

The City is the Lead Agency for the project as identified pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The Lead Agency, as defined by CEQA Guidelines
Section 15367, is the public agency which has the principal responsibility and authority for carrying out or approving the project. As Lead Agency, the City Development Services Department, Environmental Analysis Section (EAS) conducted a preliminary review of the proposed development and determined that an EIR was required, and has thus caused this document to be prepared. The analysis and findings in this document reflect the independent, impartial conclusions of the City.

### 1.2.2 Responsible and Trustee Agencies

State law requires that all EIRs be reviewed by responsible and trustee agencies. A Responsible Agency, defined pursuant to State CEQA Guidelines Section 15381, includes all public agencies other than the Lead Agency which have discretionary approval power over the project. A Trustee Agency is defined in Section 15386 of the CEQA Guidelines as a state agency having jurisdiction by law over natural resources affected by a project that are held in trust for the people of the state of California. Implementation of the project would require consultation with the following trustee agency, as described below.

**San Diego Regional Water Quality Control Board (RWQCB):** The RWQCB regulates water quality through the Section 401 certification process and oversees the National Pollutant Discharge Elimination System (NPDES) General Permit to address water quality requirements. The RWQCB would be responsible for issuing permits for the project.

### 1.3 EIR Review Process

The EIR review process occurs in two basic stages. The first stage is the Draft EIR, which offers the public the opportunity to comment on the document, while the second stage is the Final EIR, which provides the basis for approving the project.

#### 1.3.1 Draft EIR

The Draft EIR is distributed for review to the public and interested and affected agencies for a review period for the purpose of providing comments “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated” (Section 15204, CEQA Guidelines). In accordance with Sections 15085 and 15087 (a) (1) of the CEQA Guidelines, upon completion of the Draft EIR, a Notice of Completion is filed with the State Office of Planning and Research (State Clearinghouse), and a notice of availability of the Draft EIR is issued in a newspaper of general circulation in the area.
1.3.1.1 Availability and Review of the Draft EIR

The Draft EIR and all related technical studies are available for review during the public review period at the offices of the City of San Diego Development Services Department located on 1222 First Avenue, Fifth Floor, San Diego, California 92101. Copies of the Draft EIR are also available at the following public libraries:

- San Diego Public Library, Central Library, 820 E Street, San Diego, California 92101
- La Jolla Branch Library, 7555 Draper Avenue, San Diego, California 92037

This EIR is also available for review online at: http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html.

1.3.2 Final EIR

The City, as Lead Agency, will provide written responses to comments addressing the scope and adequacy of the Draft EIR per CEQA Guidelines Section 15088 and will consider all comments in making its decision whether to certify the Final EIR. The Final EIR will include responses to the comments received during public review and a Mitigation Monitoring and Reporting Program (MMRP).

The culmination of this process is a public hearing where the City Council will determine whether to certify the Final EIR as being complete and in accordance with CEQA. The Final EIR will be available for public review at least 14 days before the public hearing in order to provide commenters the opportunity to review the written responses to their comment letters.

1.4 EIR Scope and Content

1.4.1 EIR Scope

The scope of analysis for this EIR was determined by the City as a result of initial project review and consideration of comments received in response to the Notice of Preparation (NOP) circulated October 8, 2010, and a scoping meeting held on October 27, 2010, at the La Jolla Branch Library, 7555 Draper Avenue. The City’s NOP, associated responses, and comments made during the scoping meeting are included in Appendix A of this EIR.
Through these scoping activities, the Phase 1/Phase 2 project was determined to have the potential to result in the following significant environmental impacts:

- Land Use
- Transportation/Circulation/Parking
- Biological Resources
- Geologic Conditions
- Energy
- Greenhouse Gases
- Historical Resources
- Noise
- Paleontological Resources
- Hydrology
- Water Quality
- Visual Quality/
  Neighborhood Character

1.4.2 Type of EIR

This EIR has been prepared as a Project EIR, as defined in Section 15161 of the CEQA Guidelines. In accordance with CEQA, this Project EIR examines the environmental impacts of a specific development project, the proposed project, and focuses on the physical changes in the environment that would result from the project, including all project phases of planning, construction, and operation.

1.4.3 EIR Content

The intent of this EIR is to determine whether implementation of the project would have a significant effect on the environment through analysis of the issues identified during the scoping process (see Section 1.4.1 above).

Pursuant to CEQA Guidelines Section 15126, all phases of the project are considered in this EIR when evaluating its potential impacts on the environment, including the planning, acquisition, development, and operation phases. Impacts are identified as direct or indirect, short-term or long-term, and assessed on a “plan to ground” basis. The “plan to ground” analysis addresses the changes or impacts that would result from implementation of the project compared to existing ground conditions.

The analysis of cumulative impacts is presented under a separate discussion (Chapter 7.0). Effects Found Not to Be Significant (Chapter 8.0) presents a brief discussion of the environmental effects of the project that were evaluated as part of the initial scoping and review process and were found not to be potentially significant. The EIR also includes mandatory CEQA discussion areas (Chapters 5.0 and 6.0), which present a discussion of Significant Irreversible Environmental Changes and Growth Inducement, respectively, as well as a discussion of Project Alternatives (Chapter 9.0) which could avoid or reduce potentially significant environmental impacts associated with implementation of the project.
1.4.4 EIR Format

1.4.4.1 Organization

The format and order of contents of this EIR follow the direction of the City’s Environmental Impact Report Guidelines (2005). A brief overview of the various sections of this EIR is provided below:

- **Executive Summary.** Provides a summary of the EIR, a brief description of the project, identification of areas of controversy, and inclusion of a summary table identifying significant impacts, proposed mitigation measures, and impact rating after mitigation. A summary of the analyzed project alternatives and comparison of the potential impacts of the alternatives with those of the project is also provided.

- **Chapter 1, Introduction.** Contains an overview of the legal authority, purpose, and intended uses of the project EIR, as well as its scope and content. It also provides a discussion of the CEQA environmental review process, including public involvement.

- **Chapter 2, Environmental Setting.** Provides a description of the project’s regional context, location, and existing physical characteristics and land use. Available public infrastructure and services, as well as relationship to relevant plans, is also provided in this chapter.

- **Chapter 3, Project Description.** Provides a detailed discussion of the project, including background, objectives, key features, and environmental design considerations. The discretionary actions required to implement Phase 1/Phase 2 or the Existing with Improvements option, and a chronicle of project changes, are also included.

- **Chapter 4, Environmental Analysis.** Provides a detailed evaluation of potential environmental impacts for several environmental and land use issues. In accordance with the City’s EIR Guidelines, Chapter 4 begins with the issue of land use, followed by the remaining issues included in order of significance. The analysis of each issue begins with a discussion of the existing conditions, a statement of specific thresholds used to determine significance of impacts, followed by an evaluation of potential impacts and identification of specific mitigation measures to avoid or reduce any significant impacts. Where mitigation measures are required, a statement regarding the significance of the impact after mitigation is additionally provided.

- **Chapter 5, Significant Unavoidable Environmental Effects/Significant Irreversible Environmental Changes.** Discusses the significant unavoidable impacts of the project. All significant direct project impacts can be reduced to below a level of significance through implementation of the recommended mitigation measures. This chapter also describes the potentially significant irreversible changes that may be expected with development of the project and addresses the use of nonrenewable resources during its construction and operational life.
• **Chapter 6, Growth Inducement.** Evaluates the potential influence the project may have on economic or population growth within the project area as well as the region, either directly or indirectly.

• **Chapter 7, Cumulative Impacts.** Identifies the impact of the project in combination with other planned and future development in the region.

• **Chapter 8, Effects Found Not to Be Significant.** Identifies all of the issues determined in the scoping and preliminary environmental review process to be not significant, and briefly summarizes the basis for these determinations.

• **Chapter 9, Alternatives.** Provides a description of alternatives to the project, including a No Project Alternative, a Reduced Project Alternative, and an alternate location referred to as the Site 675 Alternative.

• **Chapter 10, Mitigation Monitoring and Reporting Program.** Documents all the mitigation measures identified in the EIR and required as part of the project.

• **Chapter 11, References Cited.** Lists all of the reference materials cited in the EIR.

• **Chapter 12, Individuals and Agencies Consulted.** Identifies all of the individuals and agencies contacted during preparation of the EIR.

• **Chapter 13, Certification Page.** Identifies all of the agencies, organizations, and individuals responsible for the preparation of the EIR.

### 1.4.4.2 Technical Appendixes

Technical Appendixes, used as a basis for much of the environmental analysis in the EIR, have been summarized in the EIR, and are printed under separate cover as part of the EIR. The Technical Appendixes are available for review at the City of San Diego Development Services Department, 1222 First Avenue, MS 501, San Diego, California 92101, or at various local library locations identified above in Section 1.3.1.1.

### 1.4.4.3 Incorporation by Reference

As permitted by CEQA Guidelines Section 15150, this EIR has referenced several technical studies and reports. Information from these documents has been briefly summarized in this EIR, and their relationship to this EIR described. These documents are included in Chapter 11, References Cited, are hereby incorporated by reference, and are available for review at the City of San Diego Development Services Department, 1222 First Avenue, San Diego, California 92101.
2.0 Environmental Setting

2.1 Regional Setting

The project site is located within the city and county of San Diego in southern California (Figure 2-1). The City covers approximately 320 square miles in the southwestern portion of the County. As shown in Figure 2-1, portions of the City are immediately adjacent to the United States-Mexico border, while the project site and larger portion of the City is approximately 18 miles north of the United States-Mexico border. The Pacific Ocean forms the City's western limit, and the project site lies inland 0.7 mile.

The project site is located in the LJSPD of the La Jolla Community Plan area. The La Jolla Community Plan area encompasses approximately 5,700 acres and is generally bounded on the west by the Pacific Ocean and on the east by major roads, including North Torrey Pines Road/Gilman Drive/Interstate 5 (I-5). Adjacent communities include University to the north and west, Clairemont Mesa to the east, and Pacific Beach to the south. The project site is within one of several areas citywide that are subject to the regulations of the Parking Impact Overlay Zone, and is within the Coastal Height Limit Overlay Zone, discussed in Section 2.5 below.

2.2 Project Location

The project site includes two adjacent parcels: a 0.2-acre parcel (APN 344-131-0100) at 8976 Cliffridge Avenue (Cliffridge property); and a 0.8-acre vacant lot (APN 344-120-4300). The project site is situated in Township 15 South, Range 4 West, of the San Bernardino Meridian of the United States Geologic Survey (USGS) 7.5-minute Series, La Jolla quadrangle (Figure 2-2).

The triangular-shaped site is located at the southwest corner of the intersection of La Jolla Village Drive and La Jolla Scenic Way (Figure 2-3). The UCSD campus, including Mandell Weiss and Potiker Theaters, the La Jolla Playhouse, and associated parking areas, are located to the north. Existing residences are located to the south, directly adjacent to the project site along La Jolla Scenic Drive North, and to the east, along the east side of La Jolla Scenic Way.

2.3 Existing Physical Characteristics

An overview of the existing physical setting of the project site is provided below. Additional detailed information is included in the existing conditions sections of each issue area in Chapter 4.
2.3.1 Landcover

The project site has been previously disturbed as a result of past grading activities and residential development. A single-family house and detached garage, referred to as the Cliffridge property, is situated on the southwest portion of the site. The property also contains a portion of La Jolla Scenic Drive North within the western corner of the site, and the sidewalk along the northern perimeter.

Urban/developed land uses interspersed with ornamental landscaping comprise the dominant landcover in the area surrounding the project site. Two Torrey pines \( (\text{Pinus} \text{ sp.}) \) exist at the far west end of the undeveloped lot. A large palm \( (\text{Chamaerops humilis}) \) and a eucalyptus \( (\text{Eucalyptus} \text{ sp.}) \) exist on the far eastern portion of the site. Due to the developed condition of the project site, it does not contain natural habitat and provides minimal wildlife foraging and sheltering opportunities. Raptors species such as the Cooper’s hawk \( (\text{Accipiter cooperii}) \) have the potential to nest and forage in the large eucalyptus trees in and adjacent to the project area.

2.3.2 Topography

The relatively flat project site slopes gently to the south and is bounded by steep, cut slopes on the north and east. The project site ranges in elevation from a low of 392 feet and a high of 408 feet above mean sea level. There are no dominant or unique landforms on the project site.

2.3.3 Hydrology

The project site is within both the Scripps Hydrologic Sub Area (HSA) (906.30) and Miramar HSA (906.40) of the Los Peñasquitos Hydrologic Unit (HU 906.10 to 906.50). Major water bodies within this hydrologic unit include the Los Peñasquitos Creek, Los Peñasquitos Lagoon, Rose Creek, Tecolote Creek, Mission Bay, and Miramar Reservoir; however, no surface water bodies occur on-site. In addition, the project site lies outside the 500-year floodplain as defined by the Federal Emergency Management Agency’s flood insurance rate map. Runoff from the project site sheet flows in a generally southerly direction into existing storm drain facilities.

2.3.4 Geology/Subsurface

The soil types within the immediate project vicinity are characterized as Chesterton series soils that consist of well-drained fine sandy loams with a sandy clay subsoil. In addition, minor amounts of fill associated with the public improvements exist along the site perimeter with some fill associated with the existing structure on the southwest portion of the project site.

The project site is located in the coastal plains portion of the Peninsular Ranges Province of California and is underlain by sediments of the Tertiary-age Scripps Formation and Quaternary-age Lindavista Formation. Very old paralic deposits, commonly identified as the Lindavista Formation, are anticipated to extend to depths of approximately 30 feet below the existing ground surface. The project site is not located on an active fault and is mapped on the City of
San Diego Seismic Safety Study (2008) within geologic hazards category 52, which is considered a nominal- to low-risk hazard zone.

The project site is within Mineral Resource Zone Three (MRZ-3), as identified in the General Plan’s Generalized Mineral Land Classification map. Lands classified as MRZ-3 are areas of undetermined mineral resource significance.

2.3.5 Climate/Air Quality

The project area experiences a Mediterranean-type climate and is characterized by cool summers, mild winters, occasional rainfall confined primarily to winter months, and fresh onshore breezes. Average seasonal temperatures range from the upper 70s in the summer with an average daily maximum of 65 degrees in the winter. An average of 10 inches of rainfall occurs annually between November and April. Less-than-average rainfall has occurred during the last five years.

The project site and surrounding area is located within the San Diego Air Basin, as defined by the California Air Resources Board (CARB) and San Diego Air Pollution Control District (SDAPCD). The San Diego Air Basin is classified by the SDAPCD as a “non-attainment area” because it does not meet federal and state air quality standards for ozone, and state standards for particulate matter less than ten microns in diameter (PM10). Air pollutants transported into the basin from the adjacent South Coast Air Basin (encompassing Los Angeles and Orange County) substantially contribute to the non-attainment conditions in the San Diego Air Basin.

In response to the issue of global climate change and greenhouse gas (GHG) emissions, CARB performed statewide inventories in 1990 and 2004 for seven broad sectors of economic activity: agriculture, commercial, electricity generation, forestry, industrial, residential, and transportation. The results indicated that in both years, transportation-related emissions contributed the most, followed by electricity generation and industrial emissions. From 1990 to 2004, transportation along with agriculture and electricity generation showed an increase in emissions. In 2006, the University of San Diego School of Law, Energy Policy Initiative Center prepared a local emissions inventory for the San Diego region that indicated transportation-related GHG emissions contributed the most countywide, followed by emissions associated with energy use.

2.3.6 Historical Resources

The La Jolla area has been a rich source of cultural resources, both prehistoric and historic. However, much of the area has undergone development, resulting in the loss or retrieval of most surface and subsurface cultural resources. No significant historical resources were observed on the project site during a field survey and testing program, and the records searches conducted indicated that no previously recorded cultural resources are located within the project boundary.
2.3.7 Transportation/Circulation/Parking

La Jolla Village Drive, La Jolla Scenic Way, La Jolla Scenic Drive North, and Torrey Pines Road are the major roadways in the project vicinity. La Jolla Scenic Way provides primary local access to the project site from La Jolla Village Drive. Direct access into the project site is taken via La Jolla Scenic Drive North and Cliffridge Avenue. Roadways in the project area are further described in Section 4.2.1.1, Local Circulation System. On-street parking is available on La Jolla Scenic Drive North, La Jolla Scenic Way, and Cliffridge Avenue.

The project site is served by local bus, express bus transit, and a shuttle service. A bus stop is located on the south side of La Jolla Village Drive adjacent to the project site. Class II bicycle facilities are provided along La Jolla Village Drive and Torrey Pines Road; however, no bicycle facilities are provided along La Jolla Scenic Way or La Jolla Scenic Drive. Several sidewalks within the project area provide pedestrian access to surrounding areas along the perimeter of the project site, for the campus and surrounding areas. The intersections of La Jolla Village Drive at La Jolla Scenic Way and Torrey Pines Road provide controlled pedestrian crosswalks and are often utilized by UCSD patrons.

2.4 Public Infrastructure

The project site is served by existing or planned public facilities and services. If needed, to assist in funding community-wide public services and facilities, and as a means to mitigate new development’s impact on infrastructure and public services, the City collects Development Impacts Fees (DIFs) from new development. DIFs collected at the time of building permit issuance are deposited in a special interest-bearing account used only for the identified facilities serving the community in which they are collected. As sufficient funds are collected, the City proceeds with construction programs. For some public services (e.g. parks, affordable housing), the City’s Municipal Code allows payment of fees instead of the provision of target services or payment of DIFs. Such fees are similar to DIFs in that the moneys collected go toward provision of the targeted amenities. In addition, all development projects within the City are required to pay school fees in accordance with the requirements of the San Diego City Schools, and as mandated by state law, to accommodate the needs of public schools serving existing and new development-generated students. New developments within the La Jolla Community Plan area would thus be required to pay DIFs in accordance with the La Jolla Public Facilities Financing Plan (PFFP), fees in accordance with the Municipal Code, and school fees in accordance with the requirements of San Diego City Schools.

Community-wide public utilities, such as water and sewer infrastructure, and solid waste disposal, are also funded through DIFs and managed through the City’s Capital Improvements Projects (CIP) program. The City conducts bi-annual review of public services, facilities, and utilities implementation in conjunction with the budget/CIP review cycle. As part of this review process, the City assesses the need for new or expanded services and public facilities in order to provide appropriate service levels commensurate with population increase and new
development. To ensure that development does not occur unless facilities and improvements are available to support that development, the CIP program and PFFP review cycle includes a defined public facilities phasing policy to appropriately schedule the timing and location of City improvements.

2.4.1 Fire, Emergency Medical, and Police Services

The following provides a discussion of the fire, emergency medical, and police protection services and facilities that are available to serve the project site and La Jolla community.

2.4.1.1 Fire Protection

Fire protection services to the project area are provided by the City’s Fire-Rescue Department. The General Plan states that fire stations should be sited on lots that are at least three-quarters of an acre with room for expansion, within two to two-and-a-half miles apart, and be staffed and equipped to respond to calls within their established standards. The Fire-Rescue Department’s staffing goal is one firefighter per 1,000 citizens. To ensure adequate fire protection response to fire calls, the City’s Fire-Rescue Department adheres to established national standards which require initial response of fire suppression resources, four-person engine company within five minutes, and an effective fire force, 15 firefighters within nine minutes of a call; however average response times tend to fall somewhere in the middle.

Fire Station 9 provides primary fire protection and advanced life support services to the project site and surrounding area and is located approximately 1.7 miles south of the project site at 7870 Ardath Lane. This station houses Engine 9 and Medic 9; all the personnel are Firefighter/Paramedics. In 2010, Station 9 responded to a total of 1,276 calls with an average response time of 5 minutes 49 seconds (City of San Diego 2011).

Three additional fire stations (Fire Stations 35, 13, and 16) would serve the project site under first alarm conditions or when Station 9 is not available to respond to a fire or medical emergency.

- Fire Station 35 is located at 4285 Eastgate Mall and houses Battalion 5, Engine 35, Truck 35, Brush 35, Chem 35, and Utility 35.
- Fire Station 13 is located at 809 Nautilus Street and houses Engine 13.
- Fire Station 16 is located at 2110 Via Casa Alta and houses Engine 16.

2.4.1.2 Emergency Medical

Emergency medical services are provided to the project site and throughout the City through a public/private partnership between the City’s Emergency Medical Services (EMS) and Rural Metro Corporation, which provides some personnel and some ambulances.
EMS has ambulances, paramedics, and emergency medical technicians (EMTs) who respond to emergency calls. There are four levels of calls. Level 1 is the most serious (i.e., heart attack, shortness of breath, etc.), and the closest fire engine and an advance life support ambulance respond to this type of call. The fire crew has to respond within eight minutes of being dispatched pursuant to City contract requirements, and the ambulance has to respond within 12 minutes. A Level 2 call is the next most serious; however, these calls are either reprioritized up to a Level 1 call or down to a Level 3 call. Only the advance life support ambulance responds to Level 2 calls; no fire station staff or equipment are deployed. The response time for a Level 2 call is 12 minutes, the same as for a Level 1 call. For a Level 3 call, either a basic or advance life support ambulance would respond.

A basic ambulance is staffed with two EMTs, whereas an advance life support ambulance is staffed with one paramedic and one EMT. The response time for a Level 3 call is 18 minutes. For a Level 4 call, which is not an emergency (i.e., the patient could have driven themselves to a hospital), a basic ambulance would respond within 18 minutes of being dispatched. EMS is under contract to meet the 12- or 18-minute response times at least 90 percent of the time.

### 2.4.1.3 Police Protection

Police services are provided by the San Diego Police Department. The goal citywide is to maintain 1.67 officers per 1,000 population ratio. The current budgeted staffing ratio is 1.59 officers per 1,000 residents. The Police Department does not staff individual stations based on population ratios.

The Police Department currently uses a five-level priority dispatch system, which includes, in descending order: Priority E (Emergency), One, Two, Three, and Four calls. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units; the radio dispatcher has the discretion to raise or lower the call priority as necessary based on information received. Priority E and Priority One calls involve serious crimes in progress or those with a potential for injury. The department’s goal response times are seven minutes for emergency calls; 12 minutes for Priority One calls; 30 minutes for Priority Two calls; and ninety minutes for Priority Three and Four calls.

The project site is located within the boundaries of police Beat 124 of the San Diego Police Department, Northern Division Substation. The Northern Division Substation is located approximately 2.17 miles northeast of the project site. Additional resources (such as SWAT, canine units, etc.) respond to Northern Division, including the project site, as needed.

### 2.4.2 Public Utilities

The project site is a developed urban area and is currently being served by public water, sewer, and other utilities. The following provides a discussion of the existing available public utilities that serve the project site and La Jolla community.
2.4.2.1 Water

The City provides potable water service to the project area via existing 12-inch public waters main located within La Jolla Shores Scenic Drive North and the cul-de-sac. There are also existing 16-inch, 18-inch, and 30-inch water mains located within La Jolla Village Drive and North Torrey Pines Road.

2.4.2.2 Sewer

The Public Utilities Department (PUD) collects and treats wastewater generated on-site and in the surrounding community. Existing eight-inch public sewer mains located within La Jolla Scenic Drive North and Cliffridge Avenue convey wastewater through a series of systems and then finally to the City’s Point Loma Wastewater Treatment Plant, located approximately 12 miles south of the project site. Here, the City’s wastewater is treated then discharged into the Pacific Ocean via the Point Loma Ocean Outfall.

2.4.2.3 Stormwater

There are 18-inch storm drains and inlets in the southeastern portion of the site. Runoff from the project site generally flows in a southerly direction, and existing grades permit positive runoff from all areas of the site. Surface runoff from the majority of the project site enters the public drainage system at an existing inlet west of the intersection of La Jolla Scenic Way and La Jolla Scenic Drive North, which is connected to an 18-inch storm drain line and flows along La Jolla Village Drive. Runoff from the western portion of the project site enters the gutter line and flows along La Jolla Village Drive into the La Jolla Scenic Drive North cul-de-sac, where it enters into a ditch to be taken to the Torrey Pines Road gutter line.

2.4.2.4 Solid Waste

Solid waste generated on-site and in the project area is collected by private franchised haulers and taken to the City’s Miramar Landfill, Sycamore Sanitary Landfill, or Otay Landfill. Current disposal tonnages at all City landfills are approaching capacity, and based on projected disposal rates and permitted disposal limits, the San Diego region is anticipated to exceed landfill capacity within the next few years unless landfill expansions are approved.

The City has adopted several programs and policies to reduce solid waste generation within its borders in response to landfill constraints and the state’s 1989 Integrated Waste Management Act, which mandated that all cities reduce waste disposed of in landfills by 50 percent. The Environmental Services Department developed the Source Reduction and Recycling Element to plan and manage the City’s long-term disposal needs and achieve mandated waste reduction goals.
2.5 Planning Context

Development projects in the City are generally guided by the General Plan, and more specifically by applicable community and/or specific plans. In addition, various other local, regional, and state plans, programs, policies, and ordinances regulate development of land within the City. The following provides an overview of the planning context and focuses on the key planning and regulatory documents affecting development of the project. A detailed evaluation of the project’s consistency with relevant plans and ordinances is additionally provided in Section 4.1, Land Use, of this EIR.

2.5.1 City General Plan

State law requires each city to adopt a general plan to guide its future development, and mandates that the plan be periodically updated to assure its continuing relevance and value (State Planning and Zoning Law, California Government Code, Section 65000 et seq.). State law also requires the inclusion of seven mandatory elements into the General Plan (land use, circulation, housing, conservation, noise, open space, and safety), but permits flexibility and the inclusion of optional elements to best meet the needs of a particular city.

A comprehensive update to the City’s 1979 General Plan was adopted on March 10, 2008, to reflect the City of Villages strategy developed in the adopted 2002 Strategic Framework Element. The General Plan represents a strategy to implement mixed-use, village-style development, where uses are integrated in a manner that offers a variety of housing types, is pedestrian friendly, and provides efficient transit service and public facilities densities. This strategy encompasses smart growth principles by aiming to preserve remaining open space and natural habitat and redirect development to areas with available urban amenities.

The City’s General Plan includes 10 elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, and Safety; Recreation; Conservation; Noise; Historic Preservation; and Housing. These elements contain citywide goals and policies to implement the City of Villages strategy and to direct the preparation of updated/amended community plans in order to promote the integration of housing, employment, civic, and transit opportunities. Individual community plans, in aggregate, make up the Land Use Element’s community-specific recommendations, and are bound separately with varying dates of adoption.

2.5.2 La Jolla Community Plan

The La Jolla Community Plan and Local Coastal Program Land Use Plan (La Jolla Community Plan), updated in 2001 and last amended in 2004, contains community-specific development objectives and proposals within its six elements: Transportation System, Residential Land Use, Commercial Land Use Element, Community Facilities, Parks and Services, and Heritage Resources.
2.5.3 Land Use Designation

According to the General Plan, the project site is designated as primarily Residential, along with some Park, Open Space, and Recreation. The project site is designated as low density residential in the La Jolla Community Plan.

2.5.4 Land Development Code Regulations

Chapters 11 through 14 of the City’s Municipal Code are referred to as the Land Development Code (LDC), as they contain the City’s planning, zoning, subdivision, and building regulations that dictate how land is to be developed within the city. The LDC contains citywide base zones that specify permitted land use, density, floor area ratio, and other development requirements for given zoning classifications; as well as overlay zones and supplemental regulations that provide additional development requirements. Some portions of the City are not subject to the citywide base zones, but are governed by specific planned district ordinances. Chapter 15 of the Municipal Code contains regulations pertaining to Planned Districts. Development of the project site is subject to the development regulations of the LJSPD, as well as two overlay zones: the Coastal Height Limit Overlay Zone and the Campus Parking Impact Overlay Zone.

2.5.4.1 La Jolla Shores Planned District Ordinance (LJSPD)

The northern portion of the La Jolla Community Plan area is identified in the LDC as the LJSPD. The LJSPD Ordinance is found in Chapter 15, Article 10, Divisions 1 through 4 of the Municipal Code (Section 1510.0101 et. seq.). The LJSPD Ordinance is intended to protect and enhance the residential character, natural terrain, and unique setting near the Pacific Coast through design, parking, landscaping, and other regulations. The project site is within the single-family zone in the LJSPD. According to the LJSPD Ordinance, “churches, temples, or buildings of a permanent nature, used primarily for religious purposes” are permitted uses within residential zones (Municipal Code Section 1510.0303(e) [Single-Family Zone – Permitted Uses]).

2.5.4.2 La Jolla Shores Design Manual

The architectural criteria and design standards set forth in the La Jolla Shores Design Manual (adopted in 1974) are to be used in the evaluation of the appropriateness of any development within the LJSPD. To achieve the community goals for future development, originality and diversity in architecture are encouraged in the Manual. The theme “unity with variety” is a guiding principle. The Design Manual sets forth guidelines for general design, grading, landscaping, and several other components of development.

2.5.4.3 Coastal Height Limit Overlay Zone

The Coastal Height Limit Overlay Zone (LDC, Chapter 13: Zones, Article 2: Overlay Zones, Division 5: Coastal Height Limit Overlay Zone, Section 132.0501 et. seq.) provides
supplemental regulations within designated coastal areas. The Coastal Height Limit Overlay Zone limits new buildings or additions to existing structures to a 30-foot height limit.

### 2.5.4.4 Parking Impact Overlay Zone

The project site is within one of several areas citywide that are subject to the regulations of the Parking Impact Overlay Zone (Municipal Code Section 132.0801 et. seq.). The off-street parking regulations are increased in designated areas of the City, including campus areas, due to the high parking demand.

### 2.5.5 Multiple Species Conservation Program

The Multiple Species Conservation Program (MSCP) is a comprehensive, long-term habitat conservation planning program that covers approximately 900 square miles in southwestern San Diego County under the federal and state Endangered Species Acts and state Natural Communities Conservation Planning (NCCP) Act of 1991. Local jurisdictions, including the City, implement their portions of the regional umbrella MSCP Plan through Subarea Plans, which describe specific implementing mechanisms. The MSCP Subarea Plan is a plan and process for the issuance of incidental take permits for listed species under Section 10(a)(1)(B) of the federal Endangered Species Act and section 2835 under the state Endangered Species Act. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth. The City's MSCP study area includes 206,124 acres within the City's jurisdiction. The City's Multi-Habitat Planning Area (MHPA) totals 56,831 acres, with 52,012 acres (90 percent) targeted for preservation.

#### 2.5.5.1 Multi-Habitat Planning Area

The MHPA is a permanent preserve area that is managed for its biological resources. MHPA lands are those that have been included within the City’s MSCP Subarea Plan for habitat conservation. These lands provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. MHPA lands are considered by the City to be a sensitive biological resource. The project site does not contain any MHPA lands. The closest MHPA lands are approximately 0.5 mile northwest of the site.
FIGURE 2-2
Project Location on USGS Map
FIGURE 2-3

Project Location on Aerial Photograph
3.0 Project Description

Hillel currently uses the Cliffridge property to provide religious programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD. Hillel has identified a need for additional space to improve services and provide a full range of religious programs in a centralized location for Jewish students at the UCSD campus (the project cannot be located on land owned by UCSD due to church and state separation issues). Hillel proposes to develop a permanent HCJL facility in two phases, referred to throughout this EIR as the Phase 1/Phase 2 project. Phase 1 would consist of the temporary use of the Cliffridge property as a space to provide for religious programs and construction of temporary parking. Phase 2 would consist of the construction of three individual buildings surrounded by an interior courtyard and a surface parking lot. Upon occupancy of Phase 2, the temporary use of the Cliffridge property would expire and revert back to a single dwelling unit use.

Reference to the Existing with Improvements Alternative was removed throughout the main body of the EIR. The associated analysis and discussion was incorporated into the alternatives section (Chapter 9.0). While the alternatives section did provide a summary of the Existing with Improvements Alternative, this final document offers an enhanced discussion which includes all the text previously found throughout Chapters 3.0 and 4.0. Specifically, the text added to Section 9.2.1 does not contain new information, nor has it been revised in any way other than to move its location in the document.

As an alternative to the proposed Phase 1/Phase 2 project, the Existing with Improvements option is analyzed throughout this DEIR. If the Phase 1/Phase 2 project is not approved permanently use the Cliffridge property to provide for religious programs for Jewish students at UCSD including meetings, one-on-one counseling, and administrative offices. Permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the Municipal Code would be required for the permanent use.

This EIR analyzes the project and the alternative at an equal level of detail: (i) the Phase 1/Phase 2 project for the temporary use of the Cliffridge property, temporary parking improvements, and construction of the facility for permanent use, and (ii) the Existing with Improvements option, which involves the permanent use of the Cliffridge property, permanent parking, and other improvements required to bring the Cliffridge property into compliance with the Municipal Code. The components of both options are described in greater detail in Section 3.4.
3.1 Project Objectives

Hillel would implement its religious mission to foster Jewish principles of spirituality, community building, and community service by providing a permanent religious learning and gathering space for Jewish students attending UCSD through the construction of the Phase 1/Phase 2 project. Hillel also aims to implement the broader regional and state principles of sustainable community design, consistent with objectives outlined in the La Jolla Community Plan and City General Plan.

The following objectives for Phase 1/Phase 2 thus fall into the two broad categories of objectives: serve the Hillel mission and serve broader regional and state goals for well-designed sustainable development. In accordance with CEQA Guidelines Section 15124, the following specific objectives for Phase 1/Phase 2 support the underlying purpose of the project and assist the lead agency in developing a reasonable range of alternatives to evaluate in this project EIR:

- Fulfill the religious mission of the HCJL by providing a facility for learning, community-building, and spiritual counseling that nurtures the religious, spiritual, and intellectual growth of Jewish students at UCSD.

- Provide a permanent religious space in a centralized location for Jewish students at UCSD which, because of separation of church and state issues, cannot be built on the UCSD campus but is located close to UCSD to serve students where they live and attend classes.

- Contribute to the longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses on a property owned and maintained by Hillel for use by UCSD students.

- Provide a consolidated location with enough space for programs and activities and offices for religious leaders.

- Contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.

- Enhance the pedestrian access, orientation, and walkability of the area surrounding the project site.

- Enhance the religious, spiritual, and community-building activities through the design and character of indoor and outdoor spaces.

- Implement the sustainable development goals through the installation of sustainable design features and building practices that will achieve optimal water conservation, on-site renewable energy, natural daylighting and ventilation, and a reduction in vehicle use.
through enhanced bicycle and pedestrian facilities. Exceed City goals to reduce waste and conserve regional landfill space by incorporating design measures that satisfy Leadership in Energy and Environmental Design (LEED) criteria for 75 percent diversion (reuse, recycling) of construction and operational waste.

### 3.2 Project Background

#### 3.2.1 The Hillel Foundation for Jewish Campus Life

Founded in 1923, Hillel: The Foundation for Jewish Campus Life (Hillel International) is a global Jewish campus organization that provides services and resources for Jewish students. Their overarching mission is to “enrich the lives of Jewish undergraduate and graduate students so that they may enrich the Jewish people and the world.” The foundation is named for Rabbi Hillel, an important religious leader and scholar in Jewish history. Each campus or community Hillel organization is set up as a separate independent foundation and operates independently from Hillel International. Hillel International provides each local foundation with a litany of resources including staff and professional training, accreditation of local foundations, modest financial support, hosts conferences for students and staff, and administers the Birthright program. Each local foundation operates independently and autonomously but the local Hillel foundations and Hillel International form a partnership for sharing of innovative programs and functions to further the overall mission and goal of enriching the lives of Jewish undergraduate and graduate students.

Hillel was incorporated in the State of California on July 1, 1992, “exclusively for religious purposes” under the Nonprofit Religious Corporation Law. In its Articles of Incorporation, Hillel’s specific purpose “…is to provide for the religious needs of Jewish students on the university campuses in San Diego County.” Hillel of San Diego serves nine San Diego County campuses, approximately 5,000 Jewish students who attend colleges within San Diego County.

#### 3.2.2 Purpose and Activities Overview

Hillel would pursue its mission by constructing a permanent space to facilitate the religious, spiritual, and intellectual growth of Jewish students at UCSD. By using the HCJL for a variety of religious programs such as meditation and prayer circles, programs relating to observance of Jewish holidays and festivals, study of Torah and traditional Jewish texts, programs relating to Israel as the Jewish homeland, and other Jewish religious, cultural, and social interactions, Hillel endeavors to build a strong sense of belonging and Jewish identity among UCSD students and to develop a culture infused by Jewish values.

Hillel’s programs, and the contemplated use of the HCJL, generally fall into five areas and are described below. All of these programs are considered essential to the Jewish religion and Jewish identity and living.
Jewish Spirituality. The HCJL would act as a center for Jewish spirituality, learning, and religious growth, and would house two sacred Torah scrolls. While large religious gatherings would be held at rented University facilities, smaller and more intimate ritual and religious gatherings and services such as daily services, memorial services, and meditation circles would be held at the proposed center facility. One of the Torah scrolls would be housed in the proposed library/chapel and would be used for the smaller religious gatherings. A rabbi and members of the professional staff would provide religious counseling and guidance to students on topics of spirituality, ethics, and the unique aspects of the daily lives that impact students.

Jewish Living and Learning. The HCJL would also be used to teach students how to lead services, for regular Torah and Talmud study classes and Hebrew reading classes, discussions on Jewish ethics and other contemporary issues, kosher cooking, sessions with a range of community rabbis and other Jewish scholars, Jewish book discussions, films, and other cultural activities. A Bar or Bat Mitzvah program for students who did not learn to read from the Torah as young teens would also be held at the Center proposed facility.

Jewish Community Building. The student gathering spaces at the HCJL would be intimate and focused and would be used to plan events and to host discussions and small activities to connect Jewish students with each other and help build the Jewish community. The HCJL would be used to host a variety of programs to serve the spectrum of the UCSD Jewish student community.

Israel-Oriented Activities. Because Israel is considered the Jewish spiritual homeland, one of the HCJL’s goals would be to strengthen students’ connection to Israel through Israel-oriented activities. These activities would include speakers, discussions, modern Hebrew language instruction, and orientations and planning meetings for missions to Israel. Hillel is responsible for administering the Jewish “Birthright” program, which guarantees an almost free Israel experience to college age students. The HCJL would be used by staff and students to plan and organize these trips and activities.

Community Service. The Jewish tradition of “Tikkun Olan” (or Repairing the World) directs Jews to seek and pursue justice. In following this tradition, students regularly volunteer for a range of community organizations including the American Cancer Society, Rady’s Children Hospital, the Red Cross, children’s literacy groups, and the Hand Up Youth Food Pantry. In addition, they participate in alternative spring break programs through the American Jewish World Service’s service learning programs focusing on global poverty, specifically in Central America. The HCJL would be used to organize these activities and to contextualize them within Jewish sources and traditions.

The HCJL is led by professional Jewish educators and several of its staff members have advanced training and/or education in Jewish studies and education. The HCJL benefits from the active participation and support of several community rabbis, who participate in and lead many of the programs, including weekly Torah and Talmud classes, classes on Jewish...
spirituality, and Jewish life. The HCJL would also provide offices and meeting spaces for staff to fulfill their religious mission.

3.3 Discretionary Actions

Discretionary actions are those actions taken by an agency that call for the exercise of judgment in deciding whether to approve or how to carry out a project. The lead agency would first be required to select either Phase 1/Phase 2 or the Existing with Improvements option. This EIR provides analysis and evaluation of all relevant environmental issues related to these discretionary actions associated with the project.

3.3.1 Phase 1/Phase 2

The Phase 1/Phase 2 project would require the following discretionary actions to be considered by the San Diego City Council (Decision Process 5) after a formal recommendation by the Planning Commission:

- SDP for Development within the LJSPD which would include:
  - Deviation requested from Driveway Curb Cut Requirements
  - Deviation from parking regulations from the minimum requirements
- ROW vacation for a portion of La Jolla Scenic Drive North between Torrey Pines Road and La Jolla Scenic Way

3.3.1.1 Site Development Permit

A SDP is required for development within the LJSPD. The SDP would include and a deviation from the driveway curb cut requirements and a deviation from parking regulations. Processing of the SDP includes would require submittal of a SDP application and Draft Findings to document the necessity and justification for the requested actions/deviations, in accordance with Section 126.0504(a) and (m) of the Municipal Code. The Findings for all SDPs are required to demonstrate that a proposed development would not adversely affect the applicable land use plan, would not be detrimental to the public health, safety, and welfare, and would comply with the applicable regulations of the Land Development Code. The project’s Supplemental Findings are therefore required to demonstrate that the project would materially assist in reducing impacts associated with fossil fuel energy use by utilizing alternative energy resources, self-generation, and other renewable technologies (e.g., photovoltaic) to generate electricity needed by the building and its occupants; would not be inconsistent with the purpose of the underlying zone; and that any proposed deviations would be appropriate for this location and would result in a more desirable project than would be achieved if designed in strict conformance with the development regulations of the applicable zone.

A deviation from the driveway curb cut requirements of the Municipal Code is proposed for Phase 1 only. Municipal Code Section 142.0560 (Development and Design Regulations for
Parking Facilities) requires lots for non-residential uses greater than 50-feet in width provide a 24-foot-wide driveway curb cut (see Table 142-05L in Chapter 14, Article 2, Division 5: Parking Regulations). During Phase 1 (i.e., construction of Phase 2), the project applicant proposes a Temporary Parking Plan that would include a 12-foot-wide temporary curb cut. Upon occupancy of Phase 2, the Cliffridge property would return to residential use and the 12-foot-wide driveway would be adequate. Therefore, the project applicant is seeking a deviation to allow a 12-foot-wide curb cut in order to accommodate the uses on a temporary basis until such time that Phase 2 is occupied.

A deviation from parking regulations, Municipal Code Table 142-05G, is requested. As discussed in greater detail in Sections 4.1.3.1 and 4.2.4.1, the proposed deviation would provide a total of 27 parking spaces.

3.3.1.2 Street Right-of-Way Vacation

The Phase 1/Phase 2 project proposes to vacate an unimproved portion of the existing La Jolla Scenic Drive North, a public street ROW, which requires approval of a street ROW vacation and vacation of an improved substandard cul-de-sac, along the west end of the east-west trending La Jolla Scenic Drive North, approximately 100 feet west of Cliffridge Avenue (which trends north-south). As shown in Figure 3-1, Phase 1/Phase 2 proposes to vacate the cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. The purpose of the street ROW vacation is to enhance the pedestrian environment through construction of sidewalks and landscaping features.

The northern edge of La Jolla Scenic Drive North and the southern edge of La Jolla Village Drive would accommodate a 22-foot parkway with a six-foot sidewalk on La Jolla Village Drive, and a 12-foot parkway with a six-foot sidewalk on La Jolla Scenic Drive to improve and enhance the pedestrian environment with a walkway and shade from proposed street trees. There is currently no sidewalk along the northern side of La Jolla Scenic Drive North. The cul-de-sac would be redesigned to provide a bikeway, pedestrian path, and a landscaped entryway into residential streets from the intersection of Torrey Pines and La Jolla Village Drive. The street ROW vacation, dedication, and other easements required are discussed further in Section 3.4.2.1i.

3.3.2 Existing with Improvements Option

The Existing with Improvements option would require the following discretionary actions to be considered by the San Diego City Council (Decision Process Five) after a formal recommendation by the Planning Commission:

SDP for development within the LJSPD for proposed driveway and parking improvements and deviation from the Maximum Paving and Hardscape in Residential Zones Requirement. A deviation is being requested from the Maximum Paving and Hardscape in Residential Zones requirement of the Parking Impact Overlay Zone. Per the Parking Impact Overlay Zone, paving...
and hardscape for vehicle use on lots less than 10,000 square feet in residential zones are required to be limited to off-street surface parking for a maximum of four vehicles. The Existing with Improvements option would require a deviation to provide six on-site parking spaces for Hillel employee use in order to provide religious programs for students that would visit the Cliffridge property. This is proposed in order to alleviate an additional need for parking on nearby streets in the project area. Figure 3-2 shows the Existing with Improvements site plan.

**3.4 Project Features**

**3.4.1 Development Summary**

**3.4.1.1 Phase 1/Phase 2**

Phase 1/Phase 2 would consist of the construction of a permanent HCJL in two phases. The two phases are illustrated in Figure 3-3. Hillel is currently occupying the residential structure on the approximately 0.2-acre Cliffridge property. Phase 1 would consist of the continued, temporary operation of Hillel’s religious administrative offices in this existing structure during construction of the permanent HCJL facility. The temporary use of the Cliffridge property would cease after occupancy of Phase 2, and the Cliffridge property would be returned to a single dwelling unit use.

Expanded operation would occur in Phase 2 with the completion of a permanent religious use facility. Phase 2 would involve development of a vacant, 0.8-acre parcel located to the north and east of the parcel containing the Cliffridge property. The site plan for Phase 2 is shown in Figure 3-4. Phase 2 would consist of the construction of three individual structures with a gross floor area (GFA) of 6,479 square feet, situated around a central outdoor courtyard. The proposed building area summary for Phase 2 is outlined below in Table 3-1. A surface parking lot with 27 spaces would be constructed to the east of the courtyard and structures. The proposed parking summary for both Phase 1 and Phase 2 are summarized below in Table 3-2.

In addition to the proposed building construction, Phase 2 would also involve include the landscaping of the cul-de-sac and the vacated ROW between the Cliffridge property currently occupied by Hillel and the vacant parcel. Landscaping would be provided throughout the permanent HCJL project site and street yards of adjacent streets. No exterior modifications to the Cliffridge property would be necessary. Upon completion of Phase 2, Hillel would vacate the Cliffridge property and return it to its original use. The proposed building area summary for Phase 2 is outlined below in Table 3-1. The proposed parking summary for both Phase 1 and Phase 2 are summarized below in Table 3-2.
3.0 Project Description

3.4.1.2 Existing with Improvements Option

If the Phase 1/Phase 2 project is not approved, the applicant seeks approval of the Existing with Improvements option. Under this option, the Cliffridge property would be converted to permanent use by Hillel to provide religious services and programs—including meetings, one-on-one counseling, and administrative offices—for Jewish students attending UCSD.

TABLE 3-1
PHASE 1/PHASE 2 GROSS FLOOR AREA

<table>
<thead>
<tr>
<th>Proposed Gross Floor Area</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>HCJL Center (including Phantom Floor*)</td>
<td>4,287 sf</td>
</tr>
<tr>
<td>Library/Chapel</td>
<td>984 sf</td>
</tr>
<tr>
<td>Professional Leadership Building</td>
<td>1,813 sf</td>
</tr>
<tr>
<td><strong>Total Gross Floor Area with Phantom Floor</strong></td>
<td>7,084 sf</td>
</tr>
<tr>
<td><strong>Total Gross Floor Area without Phantom Floor</strong></td>
<td>6,479 sf</td>
</tr>
</tbody>
</table>

*Phantom floors are located within the space above or below actual floors within a building, and are measured separately above each actual floor or below the lowest actual floor for under floor area (SDMC §113.0234(b)(4)). They are not occupiable space.

TABLE 3-2
PHASE 1/PHASE 2 PARKING AREA SUMMARY

<table>
<thead>
<tr>
<th>Proposed Parking Spaces</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Temporary Parking (Phase 1)</strong></td>
<td></td>
</tr>
<tr>
<td>5 Standard spaces</td>
<td></td>
</tr>
<tr>
<td>1 Van accessible space</td>
<td></td>
</tr>
<tr>
<td>2 Motorcycle spaces</td>
<td></td>
</tr>
<tr>
<td>4 Bicycle spaces</td>
<td></td>
</tr>
<tr>
<td><strong>Permanent Parking (Phase 2)</strong></td>
<td></td>
</tr>
<tr>
<td>25 Standard spaces</td>
<td></td>
</tr>
<tr>
<td>1 Accessible space</td>
<td></td>
</tr>
<tr>
<td>1 Van accessible space</td>
<td></td>
</tr>
<tr>
<td>2 Motorcycle spaces</td>
<td></td>
</tr>
<tr>
<td>4 Bicycle spaces</td>
<td></td>
</tr>
</tbody>
</table>

This would involve bringing the Cliffridge property up to all applicable code requirements for the intended religious use and occupancy and would include demolishing the existing attached garage, patio, and a tree in order to construct a paved surface parking lot. The Existing with Improvements option would provide six standard parking spaces (one as handicap-accessible) in a new surface parking lot with a new driveway connecting to the existing cul-de-sac. This would also involve the construction of a new pedestrian curb ramp on Cliffridge Avenue, which would provide access to the existing walkway at the front (east) of the residential structure. Figure 3-2 shows the site plan for the Existing with Improvements option.
3.4.2 Proposed Uses

3.4.2.1 Phase 1/Phase 2

The residential structure on the Cliffridge property consists of three individual rooms, an open area, two restrooms, and a kitchen. During construction of the new facility, Phase 1 would consist of the continued use of the residential structure as a temporary administrative space for Hillel staff activities during the development of the permanent Phase 2 facility. The staff uses the facility to plan events and programs and to meet with students on a one-on-one basis for religious counseling and planning of student events (see Figure 3-4).

Phase 2 would consist of the construction of three individual structures around a central outdoor courtyard providing 6,479 square feet of GFA. This does not include the “phantom floor” of the two story central HCJL center building, which is not occupiable space. Upon completion, the new facility would be comprised of a central HCJL center, a library/chapel, and a professional leadership building. A new HCJL center, library/chapel, and professional leadership building would comprise the facility. The facility would also include a courtyard, parking, and open space/landscaped areas. Figure 3-5 shows the ground floor building plan for Phase 2. Figure 3-6 shows the second floor building plan for Phase 2.

a. Operations

Based upon Hillel’s historical programming and its future plans for the HCJL, religious activities would typically consist of small gatherings, primarily held during weekdays while UC San Diego is in session and consist of study groups, classes, lectures, meetings, Hillel professional staff activities, and periodic events. With its proximity to campus, the HCJL would also serve as a place for students to “drop in” and connect with fellow students and Hillel staff, eat, or study.

Hillel’s regular hours of operation would be between Monday through Friday, 9:00 a.m. to 10:00 p.m., but generally the facility would only be open during the evenings and on weekends if there is an activity planned at such times. Most activities would not occur during the typical AM and PM peak hours (i.e., 7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.).

A typical week at the HCJL would consist of approximately 15 activities (3 activities per day or 150 planned activities per academic quarter). Regular weekly activities would likely consist of gatherings such as daily morning prayer services; mid-day study classes on Hebrew language, Torah, and Talmud; evening Jewish student leadership and Tritons for Israel meetings; as well as social gatherings.

Based upon UCSD Hillel’s Winter 2010 quarter program log, the 133 activities that were held, which are activities that would be held at the future HCJL, were as follows:

- 92 activities had attendance of 10 or fewer,
- 8 activities had attendance of between 11–20 students,
• 15 activities had an attendance of between 21–30 students,
• 10 activities had attendance of between 31–40 students, and
• 8 activities had attendance of between 41–50 students.

Total daily “trips” to the HCJL is expected to be approximately 200. It is expected, with limited exception, that programs held at the site would have between 10 and 50 attendees; however, a conservative approach to the operations of the facility is based on a total of up to 100 visitors to the facility during peak hours. This amount is also the basis for the environmental analysis which follows throughout Chapter 4.0.

Throughout the year, special events would occur, inclusive of Hillel staff. On rare occasion, such as the opening dedication ceremony or a “welcome back” barbeque. These events could trigger the project’s Transportation Demand and Parking Management Plan (see Section 4.2.4.1). It is anticipated that up to eight times per year, occasional special event occupancy could be between 100 to 150 attendees, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code, attendance at the HCJL could be greater than listed above, but would not be expected to exceed 100 persons at any one time. It is expected that up to seven full-time Hillel professionals would serve the HCJL. Shabbat services, concerts, high-holiday services, distinguished speaker events, and other large gatherings would continue to be held on campus in rented facilities. Additional activities such as an ice-skating social or a Shabbat retreat would be held off campus and off-site from the HCJL.

b. Structures

a. HCJL

While the facility is collectively known as the HCJL, the central structure is called the HCJL and would be a two-story building located on the western portion of the parcel. With the partial two-story design, the total GFA would be 3,682 square feet (not including the phantom floor of the second story, which is not occupiable space). On the first floor, the HCJL would include a lounge with lobby, a kitchen, two meeting rooms, men’s and women’s restrooms with showers, a storage area, and an elevator and elevator control room. The partial second floor would include activity space with a lobby, a board room, a storage room, an elevator, and two exterior balcony areas. The main entrance to the HCJL would be from the central courtyard (see Figure 3-5).

b. Library/Chapel

The library/chapel would have a GFA of 984 square feet. This one-story building would be located in the central portion of the parcel. The library/chapel would include: an open library space, a student conference room, and a storage room. The main entrance to the library/chapel would be from the central courtyard. This building would also house Hillel’s Torah scrolls and
texts on Jewish history, culture, and philosophy. The chapel would be used for Torah and Talmud study classes and for small services.

c. **Professional Leadership Building**

Professional leadership offices would have a GFA of 1,813 square feet. This one-story building would be located in the southern portion of the parcel. The administrative building would include: a reception area and lobby, three individual offices, an open office area, a copy area, a unisex restroom, a storage room, a conference room, and an electrical room. The main entrance to the administrative building would be from the central courtyard. The building would be used by Hillel professionals to plan activities, meet with students, and individual counseling of students.

c. **Parking**

**Parking Spaces**

Phase 1 would include a Temporary Parking Plan (Figure 3-7). The Temporary Parking Plan would provide parking for the existing temporary office use of the Cliffridge property. Six automobile parking spaces would be provided on-site through a combination of using the existing garage and providing new spaces in the vacated cul-de-sac. These parking spaces would be removed once construction of Phase 2 is completed. The six automobile parking spaces would include one van-accessible parking space. Two motorcycle spaces and four bicycle spaces would also be provided. The Temporary Parking Plan would also involve the construction of a temporary sidewalk connecting La Jolla Village Drive to La Jolla Scenic Drive North.

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “churches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services, or assembly area. A Parking Deviation Request is proposed (see Final EIR Section 3.3). The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities. There are no specific parking regulations for the proposed use of Phase 2 in the City’s Municipal Code (see §142.0530 – Tables 142-05E, 142-05F, and 142-05G); therefore, as determined in consultation with the City and in accordance with the traffic analysis industry’s standard procedures, a use-specific parking study and analysis was completed for the HCJL. As detailed in EIR Section 4.2.4.1(a), the adequacy of the parking ratio and parking demand assumptions employed by the project is based on data compiled from surveys of other existing Hillel facilities throughout California. The result of these parking surveys are discussed in Chapter 15.0 of the of the Traffic Impact Analysis (TIA, Appendix B to the EIR) and detailed in Appendices F, G, and P of the TIA. The study assembled data from UCSD campus student surveys, UCSD Hillel program logs, surveys on parking and uses of two comparable Hillel
facilities at University of California, Santa Barbara (UCSB) and University of California, Los Angeles (UCLA), and information on other Hillel centers’ parking supply (the detailed methodology used for the parking study is contained within Section 4.2 of this EIR).

The result of the surveys revealed that the average parking ratio for the California Hillel facilities surveyed is 1.9 parking spaces per 1,000 square feet of gross floor area. The project is proposing to provide a parking ratio of 3.7 parking spaces per 1,000 square feet of gross floor area which is higher than the average rate for other California Hillel facilities. Additionally, a survey was conducted in March 2010 among the students who currently attend Hillel-related activities at the UCSD campus. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated in their response that they would walk to the Hillel facility at its proposed location. Of the students who said they would drive, just over 50 percent of these respondents suggested they would carpool. Using the results of this survey, if 100 students were to visit the proposed facility, only 20 percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these assumptions, the parking demand would be 15 parking spaces. Assuming all seven staff are on-site at one time and each drove individually, an additional seven spaces would be required for a total of 22 spaces. The project proposes 27 spaces.

Therefore, through the approval of the parking deviation request based on the number of parking spaces proposed, it can be concluded that the project is providing adequate parking. A total of 27 spaces are proposed for Phase 2, including one handicap accessible space and one van accessible space. In addition, two motorcycle and four bicycle spaces are proposed. Showers are also included in the design for Phase 2 in order to encourage cycling. The Phase 2 surface parking plan is shown in Figure 3-8.

The parking lot/vehicular use area would be 5,701 square feet, consisting of 4,656 square feet of parking area and 1,045 square feet of landscaped area (native trees, shrubs, and groundcover). The parking area would consist of permeable pavers, decorative gravel, and concrete. Portions of the parking area (eastern and southern parking spaces) would also include a carport structure with solar photovoltaic panels on top. The partial retaining wall and landscaping combined with the solar canopy/carport would provide some visual screening of the parking and shielding of headlights at night.

d. Open Space/Landscaped Areas

For Phase 1, landscaping would consist primarily of the placement of native trees and shrubs on the northern portion of the parcel and the abandoned cul-de-sac area to screen the Cliffridge property from the sidewalk and La Jolla Village Drive. Landscaping would also include temporary bike path fencing (to be removed once Phase 2 is completed) and development of a new replacement bus stop on La Jolla Village Drive. The Landscape Concept Plan for Phase 1 is shown in Figure 3-9.
3.0 Project Description

For Phase 2, the landscape concept would use California native species and Torrey pines. The landscaping is intended to be drought-tolerant. Through a landscaped pedestrian pathway, the landscaping of Phase 2 would enhance the corner of Torrey Pines Road and La Jolla Village Drive and provide an appealing entrance to the La Jolla Shores community from the north. Landscaped open space areas would be located within the courtyard/inner yard and along either side of the bicycle/pedestrian path, the parking lot/vehicular use area, and parkways strips along La Jolla Village Drive and La Jolla Scenic Drive North. An overview of the Phase 2 landscape plan is shown in Figure 3-10 and its plant palette is provided in Figure 3-11. Approximately 10,000 square feet of landscaping is required; however, the project would provide nearly 20,000 square feet of landscaped open space.

The courtyard/inner yard area would include both pavers or pavement and a planted area. The landscaped areas would be planted with native and drought-tolerant trees, shrubs, and groundcover. The outdoor courtyard features are designed to accommodate planters and some outdoor seating.

The northwestern portion of the site where the existing cul-de-sac is located would also be landscaped with native and drought-tolerant trees, shrubs, and groundcover to create a park-like amenity. A meandering bike path would be constructed in this area leading from La Jolla Scenic Drive North to Torrey Pines Road/La Jolla Village Drive. Either side of the proposed bicycle and pedestrian pathway would also be landscaped. A three-seat bench, trash receptacle, and drinking fountain would be located to the side of the bike path, and bike path signs would be installed at the north and south ends of the path, in accordance with the LJSPD signage guidelines.

New landscaping would be provided around the perimeter of the vacant site when developed, including the street yards along La Jolla Scenic Drive North, La Jolla Scenic Way, La Jolla Village Drive, and Torrey Pines Road. The total area within the street yard along La Jolla Scenic Drive North, La Jolla Scenic Way, La Jolla Village Drive, and Torrey Pines Road equals 25,644 square feet, and is proposed to contain a planting area of 14,987 square feet (of Torrey pines and other native trees and shrubs).

The landscaping for Phase 1/Phase 2 would be drought tolerant, needing no irrigation once established. However, to comply with City regulations and for fire safety, all planting areas would be irrigated with a permanent automatic irrigation system using drip irrigation or low-precipitation and precipitation-matched sprinkle heads that utilize sensors and/or timers. All sprinkler heads in the right-of-way or within two feet of the sidewalk would have excess flow valves in them and be on valves controlled from each adjacent lot.

e. Architectural Design

Phase 1/Phase 2 Final design would reflect a contemporary style and has been designed to relate in scale and design to the adjacent single-family residential area along La Jolla Scenic Drive North through the siting of three individual structures, two one-story and one two-story,
around an outdoor courtyard (see Figure 3-5). As shown in Figures 3-12a and 3-12b, Phase 1/Phase 2 has been designed with three individual structures and landscaping features to provide an enhanced pedestrian environment, while also reflecting the scale of the adjacent neighborhood. Renderings of Phase 2 are provided in Figures 3-13A, 3-13B, and 3-14. Figures 3-13A and 3-13B display the meandering pathways leading to and from the La Jolla Village Drive and La Jolla Scenic Drive North. Figure 3-14 provides a visual of the screening elements.

**Lighting and Signage**

All existing street lights along the existing frontage would be upgraded to meet current City requirements for wattage, luminaries, and spacing. Lighting design would comply with City requirements pertaining to the installation of energy-efficient lighting fixtures, timing devices, motion-activated lighting, and directional and shielded lighting to avoid unwanted light and glare effects and conserve energy. Street lights would complement the pedestrian scale of the street. To minimize light and glare trespass from the new buildings, all exterior lighting would be installed so that all site and building luminaires would maintain safe light levels while avoiding off-site lighting impacts. Site lighting would be minimized where possible, and technologies to reduce light pollution such as full cutoff luminaires, low-reflectance surfaces, and low-angle spotlights would be utilized. Two bike path signs designed in accordance with the LJSPD signage guidelines would be installed at the north and south ends of the proposed bike path in the far west corner of the vacant site. There would also be an entrance sign located on a retaining wall.

**Walls and Enclosures**

Enclosures for trash and recycling bins, utility equipment, mechanical equipment, ducts, elevator enclosures, cooling towers, or mechanical ventilators would be contained within enclosed portions of the buildings or portions of the parking area and would be screened with walls and/or landscaping.

Retaining/screening walls and planting would be required and are shown in Figure 3-4. These would be located primarily along La Jolla Scenic Way (eastern portion of the property to screen the parking area) and La Jolla Village Drive (northern portion of property as berm and screening walls). The walls would be at least four feet in order to screen parking areas, but would not exceed a height of six feet. The total length of screening walls is 267 feet.

**f. Demolition, Grading, and Construction**

Figure 3-15 shows the conceptual grading plan. Phase 2 would entail selective demolition of portions of the existing Cliffridge property driveways and curbs in order to provide new access in accordance with current regulations. Grading would entail approximately 3,450 cubic yards of cut and 300 cubic yards of fill, necessitating the export of 3,150 cubic yards. Prior to grading operations, the general contractor would work with the City's Environmental Services Department to determine if another site in the vicinity could reuse the soil, or would haul...
the soil to an appropriate recycling facility. The westerly cul-de-sac portion of La Jolla Scenic Drive North would be abandoned, demolished, and reconstructed as a pedestrian pathway and curve into Cliffridge Drive. The existing driveway to the access to the Cliffridge property would be relocated from the abandoned cul-de-sac area to just north of the property on the new curve. All phases of the construction (including the demolition, mass and fine grading, trenching, paving, building, and architectural coating phases) would last 12–18 months.

The number of construction workers expected to be on-site during the proposed Phase 1/Phase 2 construction period would range between 5 and 20 workers per day. Construction activities are limited to 8-hour days, between the hours of 8:30 a.m. and 3:30 p.m., due to the fact that the City does not typically allow traffic control outside of these hours. However, specific construction activities may occasionally necessitate truck deliveries before 8:30 a.m. As detailed further in Section 4.2, construction traffic is temporary in nature. A construction traffic control plan would be prepared and approved by the City Traffic Control Section prior to construction activities. Construction workers would park off-site and be shuttled to the construction work site.

g. ROW Vacation, Street Dedication, and Infrastructure Easements

As detailed above in Section 3.3.1.3, Phase 1/Phase 2 proposes a ROW vacation, utility easement reservations/dedications, and a street dedication. Figure 3-16 shows the ROW vacation and utility easements. As shown in Figure 3-16, the total area of the ROW vacation along La Jolla Scenic Drive North would total 0.49 acre (21,278 square feet). Within this area, there would be four easements (three for utilities, one for water) that would be reserved from the ROW vacation, discussed in detail below. Phase 1/Phase 2 would also dedicate a 2,183-square-foot area along the northern property frontage along La Jolla Scenic Drive to the public ROW. Figure 3-17 shows the proposed ROW dedication along the northern perimeter of the project site. This area would include a new sidewalk constructed per City standards, native landscaping, and a new bus stop. Phase 1/Phase 2 proposes to narrow La Jolla Scenic Drive North by 2 feet to provide for a 12-foot parkway on the north side of the roadway with increased landscaping. La Jolla Scenic Drive North currently measures 36 feet wide from curb to curb. As detailed in Section 4.2.5.1, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards.

Utilities

New and existing electrical transformers and communications systems would be placed in underground vaults. Natural gas and water meters would be provided for the Phase 1/Phase 2 project. Within the ROW vacation, there would be two general utility easements to be reserved from the street vacation: The first easement would be for the existing overhead utility lines above the Cliffridge property, which would be undergrounded in the northwest portion of the ROW vacation and would total 3,540 square feet in area. The second easement would be for general utilities and drainage in the far southeast corner and would total 640 square feet in area. A third smaller easement for general utilities would be located just north of the second easement.
The existing overhead utility lines above the Cliffridge property would be relocated into an underground utility easement north of the property easement in Cliffridge Avenue. A second 15-foot-wide drainage and general utility easement is being requested for the far southeast corner near the parkway area of the corner of La Jolla Scenic Way and La Jolla Scenic Drive North.

**Drainage**

All drainage facilities necessary to capture and manage post-project runoff would be accommodated on-site within a private system designed in accordance with mandated Best Management Practices (BMPs). Project runoff water quality would be maintained through proposed features such as decomposed granite, concrete pavers, and other porous surfaces providing biofiltration that have been incorporated throughout the design, as well as a backflow preventer along La Jolla Scenic Drive North. As detailed above, a 15-foot drainage easement is proposed in the far southeast corner of the vacant site.

**Water**

All water facilities necessary to provide water service (domestic, irrigation, and fire) to the project site already exist at sufficient capacity to adequately serve the Phase 1/Phase 2 project. All existing water easements and encumbrances would remain, with the exception of a portion of a water facilities easement to be vacated. An Encroachment Maintenance and Removal Agreement would be required and final disposition would be determined at time of final map. Private water lines would be constructed on-site in accordance with City standards to connect to the public water lines in La Jolla Scenic Drive North. In addition, a temporary water easement along La Jolla Scenic Drive North would be quit claimed by the City upon completion of the abandonment of a portion of the 12-inch water main. This is the fourth easement located within the ROW vacation.

**Sewer**

On-site sewer facilities would be constructed and would connect with existing public sewer facilities in La Jolla Scenic Drive North. No off-site sewer improvements would be necessary, as all sewer facilities necessary to provide service to the Phase 2 site exist at sufficient capacity to adequately serve the Phase 1/Phase 2 project.

**h. Lot Coverage**

The existing Phase 2 site area, without the proposed ROW vacation and dedication, is 15,350 square feet. The proposed Phase 2 site area, with the proposed ROW vacation and dedication, would total 33,541 square feet. After the subtraction of the 10,000-square-foot landscaped area, the Phase 2 site would total 23,541 square feet.

As discussed further in Section 4.1, Land Use, the maximum allowable lot coverage in the LJSPD is 60 percent. The proposed lot coverage for Phase 2, with the landscaped area, would be 15.8 percent (5,291 square feet divided by 33,541 square feet). The lot coverage without the
landscaping would be 22.5 percent. The proposed floor area ratio (FAR), including the phantom floor of the HCJL, would total 0.21 FAR (7,084 square feet divided by 33,541 square feet).

3.4.2.2 Existing with Improvements Option

Should the SDP for Phase 1/Phase 2 not be approved, the Cliffridge property would be converted to permanent use by Hillel to provide religious services and programs to students. This would involve bringing the Cliffridge property up to all applicable code requirements for the intended use and occupancy. The continued use of the Cliffridge property would not result in any exterior modifications to the residential structure or changes to the existing architectural style. As discussed above, a paved parking lot would be constructed where the garage and patio are currently located. In addition, all facilities necessary to provide water, sewer, drainage service, and utilities to the existing property already exist at a sufficient capacity to serve the intended uses. No infrastructural improvements would be required.

a. Parking

The Existing with Improvements option would provide six standard parking spaces (one as handicap-accessible) in a new surface parking lot with a new driveway connecting to the existing cul-de-sac (see Figure 3-2). As previously detailed, the offices would be used for primarily religious purposes. Per the City’s Municipal Code (Section 142.0530, Table 142-05F), for professional office uses, 3.3 parking spaces are required per 1,000 square feet of GFA. The existing Cliffridge property is 1,792 square feet of GFA, thus six parking spaces would be required. The two existing Americans with Disabilities Act (ADA)-compliant curb ramp at the intersection of Cliffridge Avenue and La Jolla Scenic Drive North would remain (see Figure 3-2). The existing driveway would be relocated and widened to 24 feet to allow for six parking spaces. The westerly cul-de-sac portion of La Jolla Scenic Drive North would remain. The existing stop sign on Cliffridge Avenue at La Jolla Scenic Drive North would also remain.

b. Demolition, Grading and Construction

Construction includes demolition of the existing patio and garage, laying a new parking lot, and enhancing the landscaping, and would last approximately three to six months total, and would require no more than five workers per day. In accordance with City regulations and permit conditions, workers would need to park at an off-site location and be shuttled into the site. One ornamental tree in the rear of the Cliffridge property near the existing retaining wall would also be removed to accommodate the parking lot. The driveway curb cut of the existing driveway would be widened and relocated to bring the Cliffridge property up to the applicable code requirements for the intended permanent use. This would involve minor demolition to the existing flare ends of the existing driveway curb cut, some minor fine grading, and then new curb construction. No other grading or construction actions would be required.
3.4.3 Access and Circulation

3.4.3.1 Phase 1/Phase 2

Phase 1 vehicular access to the Cliffridge property would be taken from a new driveway constructed at the curve of La Jolla Scenic Drive North and Cliffridge Avenue. Before the abandonment of the cul-de-sac and construction of this new driveway, access to the Cliffridge property would continue to be taken from the existing driveway on the cul-de-sac.

Phase 2 Upon construction of the facility, vehicular access to the vacant site would be taken from the new parking area entry at La Jolla Scenic Way. Here, via a 24-foot-wide driveway and curb cut would be constructed. For adequate sight distance, 25 feet of curb would be painted red just north of the proposed driveway on La Jolla Scenic Way. Bicycles would be provided enhanced access to the Phase 2 site from the proposed bike path from Torrey Pines Road/La Jolla Village Drive.

For Phase 1/Phase 2 As previously discussed, the westerly cul-de-sac portion of La Jolla Scenic Drive North would be abandoned through the ROW vacation and the street would be reconfigured as a curve into Cliffridge Drive. For Phase 2, the existing driveway from the cul-de-sac portion of La Jolla Scenic Drive North to the Cliffridge property would be relocated. This would allow for construction of sidewalks and landscaping features in place of the cul-de-sac. The existing stop sign on Cliffridge Avenue at La Jolla Scenic Drive North would be removed, and a new left/curve sign installed on La Jolla Scenic Drive North. Phase 1/Phase 2 proposes to narrow La Jolla Scenic Drive North by two feet to 34 feet in order to provide for a 12-foot parkway on the north side of the roadway with increased landscaping. At 34 feet wide, La Jolla Scenic Drive North would still conform to City traffic standards and street design requirements. A strip along the property frontage of La Jolla Scenic Drive would be dedicated to the public right-of-way.

Pedestrian access to Phase 1/Phase 2 is planned via a non-contiguous sidewalk encompassing the facility. The primary walkway into the facility would be from a pedestrian path entry at La Jolla Village Drive. Pedestrians would not be able to access the Phase 2 site along the bike path from Torrey Pines Road/La Jolla Village Drive. Pedestrians could also access the Phase 2 site along the bike path from Torrey Pines Road/La Jolla Village Drive, as well as the sidewalk along La Jolla Scenic Drive North. New pedestrian ramps (for accessibility) would be constructed at the north and south ends of the newly landscaped area north of the Cliffridge property. The existing pedestrian ramp at La Jolla Scenic Way and La Jolla Village Drive would remain, and a new sidewalk would be constructed extending south from this location along the west side of La Jolla Scenic Way. Once within the Phase 2 site, pedestrians access the central courtyard, which has entries to all buildings as well as the parking area.
3.4.3.2 Existing with Improvements

Vehicular access for the Existing with Improvements option would continue to be taken from the cul-de-sac along La Jolla Scenic Drive North. A new 24-foot-wide concrete driveway would replace the existing driveway. This driveway would lead to the new parking lot. Pedestrian access to the Cliffridge property would be taken from Cliffridge Avenue, where a new pedestrian ramp would be constructed (at the eastern portion of the property line) in front of the property. The other ADA-compliant curb ramp at the intersection of Cliffridge Avenue and La Jolla Scenic Drive North would remain. All sidewalks surrounding the Cliffridge property would remain.

3.5 Environmental Design for Phase 1/Phase 2

Phase 1/Phase 2 includes an enhanced environmental design to comply with the City’s Sustainable Building policy (City Council Policy 900-14) and has also been designed to incorporate the U.S. Green Building Council (USGBC) LEED 2009 Rating System to achieve a development consistent with the USGBC requirements for LEED Silver certification.

The USGBC LEED provides a globally recognized green building rating system that is voluntary, consensus-based, market-driven, and based on accepted energy and environmental principles and performance criteria. Projects earning a specified minimum number of points receive a LEED Certified rating, while projects earning higher points can receive LEED Silver, LEED Gold, or LEED Platinum ratings, in ascending order.

To earn LEED certification, the design of the project must satisfy all prerequisites and a minimum number of points outlined in the applicable LEED rating system checklist. Phase 1/Phase 2 would use the LEED for New Construction & Major Renovations checklist and is seeking Silver-level approval. At the final design stage, the project applicant will submit an application to the USGBC for LEED certification seeking Silver-level approval that includes a completed checklist, supporting documentation, a project narrative, and detailed project drawings. The LEED application package will receive third-party validation of its environmental performance prior to LEED certification. Phase 1/Phase 2 would receive the official Silver-level LEED certification after construction, pending the approval of third-party inspection.

Phase 1/Phase 2 design features that are integrated with the basic design are anticipated to meet the City’s Sustainable Building policy and LEED Silver certification criteria would serve to reduce or avoid potential environmental effects associated with vehicular transportation, energy and water consumption, materials consumption, particularly consumption of nonrenewable or slowly-renewing resources, indoor air quality, and heat islands. The following outlines the LEED and sustainable building design features that have been incorporated into the design of Phase 1/Phase 2.
a. Siting and Transportation

Phase 1/Phase 2 would be sited near mass transit and includes several pedestrian and bicycle amenities that would reduce pollution and other impacts associated with individual automobile use. Phase 1/Phase 2 would be located within less than one-quarter mile of one or more existing stops for Metropolitan Transit System (MTS) bus lines usable by the Center’s students. One bus stop, the 30 route, is located immediately adjacent the property on La Jolla Village Drive just east of Torrey Pines Road. Other bus stops nearby are the 101 route, located at Revelle College Drive and North Torrey Pines Road, and the 150 route at Gilman Drive and Evening Way. Phase 1/Phase 2 would also provide permanent bicycle parking facilities, an enhanced bicycle and pedestrian path, and priority parking for low-emitting and fuel-efficient vehicles.

b. Energy Efficiency

Phase 1/Phase 2 would be consistent with optimize energy performance by exceeding the current building code/2008 Title 24 energy efficiency standards by 17.5 percent. It would accomplish this through improved heating, ventilating, and air conditioning (HVAC) systems and duct seals; enhanced ceiling, attic, and wall insulation; EnergyStar appliances; high-efficiency water heaters; energy-efficient three-coat stucco exteriors; energy-efficient lighting; and high-efficiency window glazing. These energy features would undergo independent third party inspection and diagnostics as part of the LEED verification and enhanced commissioning process. Commissioning would be conducted by a team approved by the USGBC and completed for the following energy-related systems, at a minimum:

- HVAC and refrigeration systems and associated controls.
- Lighting and daylighting controls.
- Domestic hot water systems.
- Low-flow fixtures/appliances.

Phase 1/Phase 2 would also include on-site renewable energy in the form of solar photovoltaic panels on top of the carport structures in the surface parking lot. These panels would supply 30 to 50 percent of the on-site energy demand, thus substantially reducing the demand for carbon-based energy.

c. Water Conservation

In compliance with the recent California Green Building Standards Code (CALGreen) mandates for water conservation and the City’s sustainable landscaping requirements, Phase 1/Phase 2 is designed to use less water than the current statewide average. By featuring advanced plumbing systems, such as parallel hot water piping or hot water recirculation systems, and fixtures such as ultra-low flow toilets, water-saving showerheads and kitchen faucets, and high-efficiency dish washers, Phase 1/Phase 2 has been designed to achieve a 20 percent reduction in potable water use. In accordance with CALGreen, this reduction would be demonstrated by verifying
each plumbing fixture and fitting meets the 20 percent reduced flow rate or by calculating a 20 percent reduction in the building water use baseline.

In addition to these indoor water use conservation features, Phase 1/Phase 2 would use drought-tolerant landscaping to minimize water use, and would incorporate water-efficient weather-based irrigation controllers, multi-programmable irrigation clocks, and a high-efficiency drip irrigation system or low-precipitation and precipitation-matched sprinkle heads. All sprinkler heads in the right-of-way or within two feet of the sidewalk would have excess flow valves in them and be on valves controlled from each adjacent lot.

d. Materials Use and Waste Reduction

In accordance with state and local laws, Phase 1/Phase 2 would divert at least 50 percent of on-site construction waste and ongoing operational waste from landfills through reuse and recycling. To achieve LEED Silver certification, Phase 1/Phase 2 has been designed to exceed this minimum and achieve a 75 percent reduction.

Phase 1/Phase 2 would divert demolition and construction waste from disposal in landfills by redirecting reusable and recyclable materials to appropriate facilities or charitable recipients. In compliance with LEED certification criteria and state and City policies, Phase 1/Phase 2 would achieve a 75 percent waste reduction.

To further minimize waste, Phase 1/Phase 2 would incorporate recycled materials for flooring and certified sustainable wood products and other recycled or rapidly renewable building materials (e.g., products made from quick-growing plants, like bamboo) where possible. This would reduce environmental impacts resulting from extraction and processing of virgin building materials. This practice would also increase demand for recycled-content building products and support the sustainable building economy.

Phase 1/Phase 2 would also, where possible, reduce additional environmental costs associated with transportation of distant building materials by using materials that have been extracted, harvested, or manufactured within the southern California region.

To minimize waste during the operational phase, Phase 1/Phase 2 would comply with the City Recycling Ordinance and include areas for storage and collection of recyclables and yard waste in conformance with applicable City regulations. In these areas, non-hazardous materials would be stored or collected for recycling, including paper, corrugated cardboard, glass, plastics, and metals.

e. Pollutant Control and Heat Island Reduction

To maximize shade and reduce heat island effects (thermal gradient differences between developed and undeveloped areas), the landscape plan includes strategic location of deciduous trees and other vegetation. Impervious surfaces, including paved parking areas, would also be minimized and pervious pavers used instead where practical. No chlorofluorocarbons-based
refrigerants would be used, and interior finishes, adhesives, sealants, paints and coatings, and carpet systems would be low in volatile organic compounds and meet the testing and product requirements of one or more nationally recognized green product labeling programs. Compliance with these requirements of CALGreen would be verified at plan check, and LEED would be verified through documentation. Based on the energy-efficiency strategy, annual CO$_2$ emissions avoided are over 12,000 pounds per year base case without including the effect of the photovoltaic panels. The array of photovoltaic panels would reduce carbon emissions well beyond 12,000 pounds per year.

3.6 History of Project Changes

3.6.1 Previous Project History

In 1999, at the request of Hillel, the City issued a request for proposals for potential sale of the 0.8-acre vacant site historically referred to as Site 653. In 2000, Hillel responded to the request and was awarded exclusive negotiating rights to purchase the site after a public hearing. Site 653 was also evaluated for potential incorporation into the City’s Park and Recreation Department’s open space inventory in November 2000. As detailed in a City memo from the Director of the Park and Recreation Department (McLatchy 2000), the parcel did not meet the City’s definition as an open space parcel, as it is “completely surrounded by streets and has no physical connection to existing open space, is of an insignificant size, and has no habitat value.”

Since the adoption of the La Jolla Community Plan in 2001, Site 653 has been designated for residential use, with “churches, temples, or buildings of a permanent nature, used primarily for religious purposes” (Municipal Code Section 1510.0303(e) [Single-Family Zone – Permitted Uses]) allowable in the residential zone according to the LJSPD Ordinance. In 2003, Hillel established its present location at 8976 Cliffridge Avenue—when the Cliffridge property was acquired by a private nonprofit foundation that supported Hillel. The property was renovated and provided to Hillel on a rent-free basis. Operations at this location allowed Hillel to pursue its religious purposes and mission while development of a permanent space was considered.

The HCJL was originally proposed in 2004 and included construction of an approximately 13,000-square-foot building to establish a permanent location for UCSD Hillel activities. This project also included underground parking and a large community gathering space for Shabbat services and weekly Shabbat programs. Site 653, along with the vacated ROW, was sold by the City to Hillel in 2006 pursuant to City Council Resolution R-301433. The City Council approved a Mitigated Negative Declaration, SDP, Planned Development Permit, and Street Vacation for the construction of the larger Hillel Center in 2008. The Mitigated Negative Declaration was subsequently challenged by project opponents, and the Court of Appeal issued a ruling in 2009 that overturned the project approvals and required the City to prepare an EIR that would include analysis of potential impacts to traffic and parking, biological resources, and aesthetics and community character. The project opponents also challenged the sale and the transfer of the property to Hillel, which were upheld by the Court of Appeals.
3.6.2 Phase 1/Phase 2 Project Changes

Several physical changes have been made to Phase 1/Phase 2 in response to environmental concerns raised during the City's review in association with the prior project. The majority of the environmental concerns raised had to do with aesthetics, parking, and public nuisances such as light/glare and noise. In response to nearby residents’ concern about the mass and scale of the project and its contemplated uses, the HCJL was redesigned, as now proposed with three buildings totaling 6,479 square feet of GFA (not including the phantom floor). The religious programs proposed for the larger facility have been re-envisioned as smaller gatherings and more directed study groups. As the HCJL is about half the size and does not include a large gathering space, parking for a smaller facility would now be accommodated by a surface parking lot.

Specific Phase 1/Phase 2 project changes or redesigns resulting from the review include:

- By designing three smaller, individual structures (two one-story buildings and one partial two-story building), Phase 1/Phase 2 the current project design would more closely relate in scale to the adjacent single-family residences along La Jolla Scenic Drive North and Cliffridge Avenue.

- In accordance with The current redesign and lower parking demand, the Phase 1/Phase 2 project currently proposes a surface parking lot that can would accommodate the required proposed 27 parking spaces.

- The most recent current redesign of the Phase 1/Phase 2 parking lot responded to community concerns regarding height and aesthetics by grading the parking lot four to six feet lower than the courtyard and building pad level to help soften the perceived height of the site at the corner of La Jolla Village Drive.

- Moving the Phase 1/Phase 2 building area away from the corner of La Jolla Village Drive and La Jolla Scenic Way to better address the height differences between the sidewalk and the existing pad elevation of the site.

- The current redesign of the proposed Phase 1/Phase 2 parking lot and street yard would provide a spatial buffer along La Jolla Scenic Way to the attached single-family residential development across the street.

- Proposed new landscaping and partial height walls in the vehicular use area would visually screen the Phase 1/Phase 2 parking lot from neighbors.

- The Phase 1/Phase 2 parking lot has been redesigned to reduce neighbors’ concerns of headlights exiting the project at night because the parking lot would no longer have ramps up to the street level.
3.0 Project Description

- Redesign of the Phase 1/Phase 2: The current design of the project such that it no longer includes an underground parking garage or a curb cut deviation.

- Phase 1/Phase 2 has been redesigned: The current redesigned project to meet the standards required to obtain a LEED Silver rating. Phase 1/Phase 2 would include on-site photovoltaic features and an increased emphasis on sustainable building design, materials, and techniques.

- Since the project’s recirculation, the City has required all qualifying projects to prepare a Climate Action Plan Consistency Checklist. The checklist for the proposed project is attached to the Final EIR as Appendix E.
Figure 3-2 has been moved to Chapter 9.0 and is now shown as Figure 9-1.
FIGURE 3-3
Phase 1/Phase 2 Boundaries

Map Source: M.W. Steele Group, Inc., June 2010
FIGURE 3-4
Phase 1/Phase 2 Site Plan

Legend

Map Source: M.W. Steele Group, Inc., January 2010
FIGURE 3-8
Phase 2 Courtyard and Surface Parking Plan

Map Source: M.W. Steele Group, Inc.
FIGURE 3-9
Phase 1 Temporary Landscape Concept Plan
FIGURE 3-11
Phase 2 Landscape Plant Palette
FIGURE 3-12A
Phase 2 Proposed Building Elevations (East and West)
FIGURE 3-12B
Phase 2 Proposed Building Elevations (South and North)
FIGURE 3-13B
Phase 2 On-site Pedestrian Pathways
No Scale
FIGURE 3-17
Street ROW Dedication for Phase 1/Phase 2

LEGEND
- Indicates Street Dedication
  Area: 2,183 SQFT, 0.05 ACRE
- Property Line
- Right of Way Line
- Centerline

REFERENCE DRAWINGS:
MAP 4065
MAP 3528

No Scale
4.0 Environmental Analysis

The following sections analyze the potential environmental impacts that may occur as a result of project implementation. The environmental issues subject to detailed analysis in the following sections include those that were identified by the City through preliminary project review and in response to the NOP and public scoping meeting as potentially significant.

4.1 Land Use
4.2 Transportation/Circulation/Parking
4.3 Biological Resources
4.4 Geologic Conditions
4.5 Energy
4.6 Greenhouse Gases
4.7 Historical Resources
4.8 Noise
4.9 Paleontological Resources
4.10 Hydrology
4.11 Water Quality
4.12 Visual Effects and Neighborhood Character

Each issue analysis section is formatted to include a summary of existing conditions, the criteria for the determination of impact significance, evaluation of potential project impacts, a list of required mitigation measures if applicable, and conclusion of significance after mitigation for impacts identified as requiring mitigation.

All potential direct and indirect impacts in Chapter 4.0 are evaluated in relation to applicable City, state, and federal standards, as reflected in the City’s 2011 Significance Determination Thresholds. The Significance Determination Thresholds include goals and standards for each environmental issue that are largely in accord with the General Plan. Where the General Plan includes updated standards, those are additionally considered in the impact evaluation in Chapter 4.0.
4.1 Land Use

This section addresses the consistency of the project with the development regulations of the LDC and with the goals and policies contained in applicable land use plans. The determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in the creation of secondary physical environmental impacts considered significant under CEQA.

4.1.1 Existing Conditions

4.1.1.1 Existing Land Use Plans and Development Regulations

The project site contains the Cliffridge property that currently serves as the Hillel office. The remainder of the site is currently vacant. The project site is surrounded by residential and institutional uses. La Jolla Village Drive, a major roadway, and the UCSD campus are situated to the north; La Jolla Scenic Drive North and a single-family residential neighborhood are to the south. To the east lies La Jolla Scenic Way and further east are attached single-family residences.

The Planning Context of the Environmental Setting, Section 2.5 of this EIR, describes the land use plans and development regulations that apply to development of the project. The following provides a brief recount or expansion of the planning context’s discussion of selected plans and development regulations, including the City General Plan, La Jolla Community Plan, and pertinent LDC regulations.

a. General Plan

The Land Use and Community Planning Element (Land Use Element) provides policies to implement the City of Villages strategy within the context of San Diego’s community planning program. The element addresses land use issues that apply to the City as a whole and identifies the community planning program as the mechanism to designate land uses, identify site-specific recommendations, and refine citywide policies as needed. The Land Use Element establishes a structure for the diversity of each community and includes policy direction to govern the preparation of community plans. The element addresses zoning and policy consistency, the plan amendment process, airport-land use planning, balanced communities, equitable development, and environmental justice.

The General Plan Land Use Element identifies the project site in the General Plan’s Land Use and Street System Map (contained in the Land Use Element, Figure LU-2) as Residential. The area of the cul-de-sac is designated as Roads/Freeways/Transportation and the northeast corner of the project site (0.17 acre) is designated as Park, Open Space and Recreation. The Residential general land use category encompasses single-family and multi-family residential
uses; however, the immediate residential area of La Jolla Shores to the south and east is single-family. With the exception of the La Jolla Athletic Area (Allen Field) to the west which is designated as Park, Open Space, and Recreation, the project site is surrounded to the north and west by large areas of Institutional and Public and Semi-Public Facilities which are made up by USCD and the Scripps Institute of Oceanography.

The **Mobility Element** contains policies that promote a balanced, multi-modal transportation network while minimizing environmental and neighborhood impacts. In addition to addressing walking, streets, and transit, the element also includes policies related to regional collaboration, bicycling, parking, the movement of goods, and other components of the transportation system. The Mobility Element contains goals and policies related to walkable communities as a way to promote a safe and comfortable pedestrian environment and a pedestrian-friendly street, site, and building design. For example, Mobility Element policy ME-A.2 aims to “design and implement safe pedestrian routes,” and policy ME-A.7 calls for improved walkability through pedestrian-oriented design.

**Urban Design Element** policies call for development that respects the City’s natural setting; enhances the distinctiveness of neighborhoods; strengthens the natural and built linkages; and creates mixed-use, walkable villages throughout the City. The Urban Design Element addresses urban form and design through policies relative to San Diego’s natural environment that work to preserve open space systems and target new growth into compact villages. Specific policies related to architecture, landscaping, and design are discussed further in Section 4.12.1.3, Applicable Design Regulations, of this EIR.

The intent of the **Economic Prosperity Element** is to create an environment that fosters creativity and allows San Diego to better compete in the regional, national, and global economic setting. This element links economic prosperity goals with land use distribution and employment land use policies. The element also expands the traditional focus of a general plan to include economic development policies that have a less direct effect on land use. These include policies aimed at supporting existing and new businesses that reflect the changing nature of industry, creating the types of jobs most beneficial to the local economy, and preparing the City’s workforce to compete for these jobs in the global marketplace.

The **Public Facilities, Services, and Safety Element** is directed at providing adequate public facilities through policies that address public financing strategies, public and developer financing responsibilities, prioritization, and the provision of specific facilities and services that must accompany growth. The policies within the Public Facilities Element also apply to transportation and park and recreation facilities and services.

The goals and policies of the **Recreation Element** have been developed to take advantage of the City’s natural environment and resources, to build upon existing recreation facilities and services, to help achieve an equitable balance of recreational resources, and to adapt to future recreation needs. The Recreation Element contains policies to address the challenge of meeting the public’s park and recreational needs; the inequitable distribution of parks citywide, especially
acute in the older, urbanized communities; and to work toward achieving a sustainable, accessible, and diverse park and recreation system. The Recreation Element also addresses alternative methods, or “equivalencies,” to achieve citywide equity where constraints may make meeting City guidelines for public parks infeasible, or to satisfy community-specific needs and demands.

The Conservation Element contains policies to guide the conservation of resources that are fundamental components of San Diego’s environment, that help define the City’s identity, and that are relied upon for continued economic prosperity. San Diego's resources include, but are not limited to, water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy. The Conservation Element contains specific policies on climate change and sustainable development. Policies CE-A.5 through CE-A.12 address the reduction of the City’s overall carbon dioxide footprint through measures such as sustainable building techniques, reuse of building materials, and sustainable landscape design and maintenance.

The Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources.

The Noise Element provides goals and policies to guide compatible land uses and the incorporation of noise attenuation measures for new uses to protect people living and working in the city from an excessive noise environment.

The separately adopted 2005–2010 Housing Element is intended to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group.

b. La Jolla Community Plan

The community plan includes objectives and proposals to ensure quality site design consistent with the General Plan and appropriate to the community. Community plans provide the level of information that is needed in order to review and assess proposed public and private development projects. However, community plans are policy documents that do not contain regulatory requirements. Regulatory requirements are addressed below under the LDC and LJSPD Ordinance.

The La Jolla community borders the Pacific Ocean and values the relationship with the ocean’s coastline and other natural elements such as hillsides and canyons. Development of the project site is subject to the proposals and recommendations of the underlying residential land use designation of the La Jolla Community Plan which was adopted in 2001 and most recently amended in 2004. In addition to a coastal program, the La Jolla Community Plan contains the following six elements, some of which are briefly described in the ensuing paragraphs.

According to the Planning Context for the La Jolla Community Plan, approximately 99 percent of the land designated for development has been built upon. With this in mind, the La Jolla Community Plan area is intended to guide the growth and development of the planning area.
Each of the plan elements contains goals focused on protecting environmentally sensitive areas, enhancing public access and public amenities, and maintaining the residential character and important landmarks.

Coastal areas, hillsides, and canyons are precious natural resources identified in this community. Therefore, the first goal of the Natural Resources and Open Space System Element is to protect these natural amenities, including public views and access. In addition, this element recognizes the importance of environmentally sensitive areas and linkages. This element provides an inventory of open space areas, including dedicated open space/park, designated open space/park, and private open space. The project site is not identified as open space according to this inventory, nor is the project site designated as environmentally sensitive, MHPA, or as a public viewshed/corridor.

The La Jolla Community Plan expresses the need to ease traffic congestion by improving the existing circulation system. This issue is carried over into the goals and policies for the Transportation System Element. In addition, the element promotes the efficiency of public transit by addressing bicycling and safe pedestrian routes as alternate modes of transportation. Finally, the third area of this element seeks to address the availability of public parking. The Transportation System Element contains proposals to enhance the local circulation system and to reduce dependence on the automobile through provision of efficient alternative methods of mobility.

The Residential Land Use Element contains recommendations related to community character, hillside development, development near coastal bluffs, geologically unstable risk areas, balanced communities, visual resources and public access, and energy efficiency. As La Jolla is primarily residential, maintaining this character and protecting natural amenities limits the extent of future development. In addition, the element indicates a sensitivity to the bulk and scale of infill development. The project site is within an area recommended for low density use (5-9 dwelling units per net residential acre).

The Commercial Land Use Element proposes goals to guide the commercial development of the La Jolla community, including the commercial core known as the La Jolla Village. The element provides designations for a variety of commercial uses and specific recommendations for Bird Rock, Nautilus Street and La Jolla Boulevard, Pearl Street, Avenida de la Playa, Village Area, Girard Avenue and Silverado Street, and Fay Avenue and Silverado Street.

The Community Facilities, Parks and Services Element addresses schools, libraries, public parks, and community services. The goals of this element include: providing adequate facilities, maximizing the use of public amenities and services, and considering design and environmentally sensitive areas in the development of new facilities. Policies are identified for each type of facility.

The goal of the Heritage Resources Element is to “preserve the heritage of La Jolla by identifying structures or natural features within the community that are important local landmarks.
or that hold community-wide significance and by designating them as historic sites.” Heritage resources include archaeological sites, historical sites, cultural landscapes/uses, and paleontological resources. Policies in this element are included to protect significant sites, maintain a survey of historic and architectural sites, encourage adaptive reuse that preserves structural integrity and value of historic structures, and preserve sensitive paleontological resources.

c. Land Development Code Regulations

According to General Plan Land Use Element goals, zones and development regulations are needed to better implement community plans. Chapters 11 through 15 of the City’s Municipal Code are referred to as the LDC, as they contain the City’s planning, zoning, subdivision, and building regulations that dictate how land is to be developed within the city. The LDC is discussed at length in Section 2.5.4 of this EIR. To summarize, the LDC contains citywide base zones that specify permitted land use, density, and other development requirements for given zoning classifications, as well as overlay zones and supplemental regulations that provide additional development requirements. Some portions of the City are not governed by the citywide zones and regulations, rather those areas are subject to planned district ordinances. The subject property lies within the LJSPD.

Development of the project site is subject to the development regulations of applicable overlay zones, the Coastal Height Limit Overlay Zone and the Parking Impact Overlay Zone, as well as the LJSPD Ordinance.

The Coastal Height Limit Overlay Zone limits new buildings or additions to existing structures to 30 feet. The entire project area is also within the Parking Impact Overlay Zone due to the project’s proximity to the UCSD campus. The Parking Impact Overlay Zone provides supplemental parking regulations for areas in order to increase parking in areas with parking demand.

The project site is located along the northern boundary of the LJSPD. The LJSPD Ordinance is excerpted below (Municipal Code Section 1510.0101).

(a) The public health, safety, and welfare require that property in La Jolla Shores shall be protected from impairment in value and that the distinctive residential character and the open seascape orientation of the La Jolla Shores Area shall be retained and enhanced.

(b) The development of land in La Jolla Shores should be controlled so as to protect and enhance the area’s unique ocean-oriented setting, architectural character and natural terrain and enable the area to maintain its distinctive identity as part of one of the outstanding residential areas of the Pacific Coast. The proper development of La Jolla Shores is in keeping with the objectives and proposals of the Progress Guide and General Plan for the City
According to the LJSPD Ordinance, “churches, temples, or buildings of a permanent nature, used primarily for religious purposes” are permitted uses within residential zones (Municipal Code Section 1510.0303(e) [Single-Family Zone – Permitted Uses]). In addition to the Single-Family Zone Development Regulations, the LJSPD includes landscaping and parking regulations which are further discussed in Section 4.12.1.3, Applicable Design Regulations.

The City Manager administers and ensures compliance with the regulations and procedures contained within the LJSPD in the manner prescribed herein for both public and private developments. The City Manager also recommends to the Planning Commission any changes to the regulations, provided such changes are necessary for the proper execution of the adopted plan, and to adopt rules of procedure to supplement those contained within the LJSPD Ordinance.

For development projects within the LJSPD area, a LJSPD Permit, which is processed as a SDP, is required before the construction or major remodeling of any new building or structure, or the demolition of any existing building. A LJSPD Permit is not required for interior modification, repairs, or minor remodeling, or any minor exterior repairs or alterations.

The La Jolla Shores Advisory Board reviews LJSPD Permit applications and makes a recommendation on whether the building, structure, or improvements for which the permit was applied does or does not conform to the LJSPD regulations. Applications for improvements that are determined to be minor in scope may be approved or denied directly, without receiving recommendations or comments from the La Jolla Shores Advisory Board. When CEQA requires that an EIR be prepared in conjunction with an application within the LJSPD, the Advisory Board shall review this report before submitting its recommendation. The Advisory Board shall utilize architectural criteria and design standards adopted by the City Council in evaluating the appropriateness of any development for which a permit is applied under the LJSPD ordinance.

There are seven members of the La Jolla Shores Advisory Board. As stated in the LJSPD Ordinance, Advisory Board members “are persons who are specifically qualified by reason of interest, training or experience in art, architecture, land development, landscape architecture, planning, urban design, or other relevant business or profession to judge the effects of a proposed development upon the desirability, property values, and development of surrounding areas. At least one member of the seven-member Advisory Board must be a registered architect in the State of California. The Advisory Board shall use architectural criteria and design standards adopted by the City in evaluating the appropriateness of any development for which a permit is applied under the LJSPD Ordinance.”
d. La Jolla Shores Design Manual

The architectural criteria and design standards are set forth in the La Jolla Shores Design Manual (adopted in 1974) and are to be used in the evaluation of the appropriateness of any development within the LJSPD. The Design Manual includes General Design Guidelines (including grading, lighting, landscaping, and off-street parking), as well as Residential and Visitor Area Guidelines (including building heights and lot coverage, the house, and street environment). A detailed discussion of these regulations is contained within Section 4.12, Visual Effects and Neighborhood Character.

e. City of San Diego Climate Action Plan

The City adopted its Climate Action Plan (CAP) in December 2015. The CAP serves as mitigation for the City’s 2008 General Plan. The General Plan calls for the City to reduce its carbon footprint through actions including adopting new or amended regulations, programs, and incentives. General Plan Policy CE-A.13 specifically identifies the need for an update of the City’s 2005 Climate Protection Action Plan that identifies actions and programs to reduce the GHG emissions of the community-at-large, and City operations. Additionally, with future implementing actions, it is anticipated that the CAP will serve as a “Qualified GHG Reduction Plan” for purposes of tiering under CEQA. The CAP quantifies baseline GHG emissions for 2010; provides emissions forecasts for 2020 and 2035; establishes reduction targets for 2020 and 2035; identifies strategies and measures to reduce GHG levels; and provides guidance for monitoring progress on an annual basis. Implementation of the CAP relies on compliance with various policies within the General Plan.

The City adopted its CAP Consistency Checklist in July 2016. The CAP Consistency Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of the measures would ensure that new development is consistent with the CAP’s assumptions.

4.1.2 Significance Determination Thresholds

Based on the City’s 2011 Significance Determination Thresholds, impacts related to land use would be significant if the project would:

- Require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment;

- Result in a conflict with the environmental goals, objectives, or recommendations of the General Plan or the Community Plan in which it is located; and/or

- Result in land uses that are not compatible with existing or planned surrounding land uses.
4.1.3 Issue 1: Deviation or Variance

Would the project require a deviation or variance, which would in turn result in a physical impact on the environment?

4.1.3.1 Impacts

a. Phase 1/Phase 2

The following discussion evaluates the deviation from applicable development regulations of the LDC and LJSPD ordinance, which regulates design and permitted uses within the northern portion of the La Jolla Community Plan area.

Phase 1/Phase 2 is requesting a street vacation and SDP with a temporary deviation from curb cut requirements (Phase 1) and a deviation from parking requirements. As described in Chapter 3.0, Project Description, a ROW vacation is required to vacate a portion of the public right-of-way for La Jolla Scenic Drive North, including the cul-de-sac. The purpose of the right-of-way vacation is to enhance the pedestrian environment through construction of sidewalks and landscaping features.

The SDP is required for development according to the LJSPD and for deviations specific to the site. As part of this process, the project applicant has completed a Request for Deviations Form detailing the requested deviation from the regulations and why the deviation is needed. Phase 1/Phase 2 would require a deviation from the requirements of the development regulations regarding temporary curb cuts during Phase 1. In response to parking concerns raised during the public review period, a Deviation from Parking Requirements has been included as part of the project. As discussed in greater detail in Sections 4.1.3.1 and 4.2.4.1, the proposed deviation would provide a total of 27 on-site parking spaces.

Deviation from Driveway Curb Cut Requirements

Based on the Phase 1/Phase 2 design, Municipal Code Section 142.0560 (Development and Design Regulations for Parking Facilities) requires a 24-foot-wide driveway curb cut for the temporary Phase 1 site. During Phase 1 (e.g., during construction of Phase 2), the project applicant proposes a Temporary Parking Plan that includes a 12-foot-wide temporary curb cut. The temporary use of the Cliffridge property will cease after occupancy of Phase 2, the Cliffridge property would return to residential use, and the 12-foot drive would be adequate. Therefore, the project would require a deviation to allow a 12-foot-wide curb cut in order to accommodate the non-residential uses on a temporary basis until such time that occupancy of Phase 2 occurs.

The deviation from Driveway Curb Cut Requirements is requested in order to bring the project into better scale with the residential character of the neighborhood. As stated in the City’s Significance Determination Thresholds regarding land use, project inconsistency with a plan or regulation does not by itself constitute a significant environmental impact. The plan/regulation
inconsistency would have to result in or relate to a significant environmental impact in order to be considered significant pursuant to the City's guidelines and CEQA. By allowing a temporary reduced width for the driveway access during construction of Phase 2 facilities, the proposed deviation from the development regulations would not create secondary environmental effects.

The proposed deviation is temporary and would not result in secondary environmental effects, such as traffic safety impacts. The parking area with the 12-foot-wide curb cut would be used by the Hillel staff members. There would not be a significant amount of inbound or outbound traffic from the parking lot during this phase of the project (i.e., approximately 12–16 trips out of the parking area per day). Thus, due to its temporary nature, this deviation would not result in significant direct or secondary environmental effects. Therefore, impacts would be less than significant.

**Deviation from Parking Requirements**

Municipal Code Table 142-05G, Parking Ratios for Specified Non-Residential Uses, identifies parking requirements for “[c]hurches and places of religious assembly.” This category of use considers the parking needs associated with gatherings of large numbers of people at the same time. This is demonstrated by the units of measure being “seats,” “pew space,” and/or “assembly area.” The day-to-day activities are not used as traditional assembly areas. The project does not propose pews, permanent seats for services, or assembly area. A Parking Deviation Request is proposed. The deviation would allow the project to provide parking based on the specific needs of the facility as determined by existing comparable facilities (see Section 4.2.4.1). The results of parking surveys, including an evaluation of the number of individuals who indicated they would walk to the facility, resulted in a determination that a total of 27 parking spaces would be adequate to serve the anticipated programing at the facility.

**b. Existing with Improvements Option**

The Existing with Improvements option would require a SDP for development in accordance with the LJSPD. As part of this process, the project applicant requires a deviation from the Maximum Paving and Hardscape in Residential Zones requirement.

**Deviation from the Maximum Paving and Hardscape in Residential Zones Requirement**

The project site is located within the Campus Parking Impact Overlay Zone.

Per Section 131.0447(c) of the Municipal Code, “Maximum Paving and Hardscape in Residential Zones”:

In order to maintain the character of the RS zone, paving and hardscape for vehicular use on lots less than 10,000 square feet, shall be further limited to off-street, surface parking for a maximum of four vehicles. Additional paving and
hardscape shall be permitted for non-vehicular use or where necessary to provide vehicular access to garage parking.

The Cliffridge property's lot is less than 10,000 square feet, and would be limited to paving and hardscape for a maximum of six vehicle spaces (one handicap accessible) and two motorcycle spaces. As previously detailed in Chapter 3, the offices would be used for primarily religious purposes. Per the City's Municipal Code (Section 142.0530, Table 142-05F), for professional office uses, 3.3 parking spaces are required per 1,000 square feet of gross floor area. The existing Cliffridge house is 1,792 square feet (GFA); thus, six parking spaces would be required. Therefore, a deviation would be required to allow paving and hardscape to provide six parking spaces on-site.

The permanent parking plan for the Existing with Improvements option is designed to accommodate parking along the western edge of the site, facing Torrey Pines Road, and screened by the existing wall on the perimeter of the site. One of the six spaces would be van accessible and would include a marked walkway to the offices. The additional parking paving would be provided as part of the driveway redesign that would locate a longer driveway from the existing garage location at the back of the lot along the north side of the residential structure out to Cliffridge Avenue. The proposed design would provide landscaping features to sufficiently screen the hardscape areas.

The intent of these regulations is to maintain the character of the residential (RS) zone. The Cliffridge property is the last residence towards the northwestern edge of the single-family subdivision, bordered by Torrey Pines Road, La Jolla Scenic Drive North, Cliffridge Avenue, and a single-family residence to the south. The Cliffridge property is not in a highly visible area (i.e., in the middle of the neighborhood surrounded by other residences). The parking area would be shielded from view along Torrey Pines Road by existing walls and from the adjacent single-family residence by landscaping. Vehicles entering the lot would do so from the cul-de-sac west of Cliffridge Avenue. Thus, the deviation of allowing an extra two cars to park in the paved area would not significantly alter the character of this residential area.

Furthermore, as evaluated throughout Chapter 4 of this EIR, this parking area would not trigger significant direct or secondary physical impacts. For example, as discussed in Section 4.10.3.1, this parking area would be in a location where the garage and deck were once located, and thus would not result in hydrological impacts related to the increase of impervious surfaces. The proposed deviation would alleviate a need for parking on nearby streets while also creating a design that is compatible with the adjacent residential scale and setting. Therefore, impacts associated with this deviation would be less than significant.
4.1.3.2 Significance of Impacts

a. Phase 1/Phase 2

The proposed deviations would not result in direct or secondary physical environmental effects. Impacts would be less than significant.

b. Existing with Improvements Option

The proposed deviation would not result in direct or secondary physical environmental effects. Impacts would be less than significant.

4.1.3.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.

4.1.4 Issue 2: Land Use Compatibility

Would the project result in a conflict with the environmental goals, objectives, and recommendations of the General Plan or the Community Plan in which it is located; or would the project result in land uses that are not compatible with existing or planned surrounding land uses?

4.1.4.1 Impacts

a. Phase 1/Phase 2

General Plan and La Jolla Community Plan

Phase 1/Phase 2 involves the development of a vacant site located adjacent to a bus stop. The site plan and orientation seek to promote walkability and enhance the pedestrian access. These objectives would be accomplished through pedestrian and bicycle paths. Phase 1/Phase 2 would also incorporate sustainable design features and building practices which would further the citywide goals and objectives related to sustainability.

As discussed above, the La Jolla Community Plan emphasizes overarching goals to protect natural areas, enhance public access to coastal areas, and maintain the residential character and important landmarks. As outlined in the LJSPD regulations (Municipal Code Section
1510.0101 et. seq.), the intent of the ordinance is to protect and enhance the character of La Jolla Shores, including natural terrain.

The vacant site associated with Phase 2 is not located on an environmentally sensitive area, coast/shoreline, or steep hillside. Therefore, elements of the community plan and LJSPD ordinance most relevant to Phase 2 are related to the residential character of the project area.

The vacant site is located within an area currently designated for residential use by the La Jolla Community Plan and is on a parcel that is designated for low-density residential use, 5-9 dwelling units per acre. The LJSPD provides additional guidance on permitted uses within this zone and lists churches, temples, or buildings of a permanent nature, used primarily for religious purposes as permitted uses within the single-family zone. The Phase 1/Phase 2 project’s relation to the LJSPD Ordinance is discussed in detail in the next section.

The vacant site is not designated as open space requiring the protection, access, and preservation of public view identified in the Natural Resources and Open Space System Element. However, the project would provide additional landscaping and open space areas with pedestrian pathways that would provide a community amenity and inviting entrance for the La Jolla Shores neighborhood.

Phase 1/Phase 2 would include modifications to the local circulation system to improve the pedestrian environment and connectivity and provision of bicycle storage that would be consistent with the La Jolla Community Plan Transportation System Element, City of San Diego General Plan Mobility Element, and Bicycle Master Plan. Wide sidewalks, landscaped strips, and sitting areas would be placed where pedestrian activity is high and walkways would be sharply delineated from traffic areas. Canopied trees would be located adjacent to the curb, between the street and sidewalk. Phase 1/Phase 2 would provide safe routes between and through the interior of development, which is separated from vehicular traffic. The project would incorporate handicapped access into design.

In addition, the La Jolla Community Plan recommends and encourages energy efficient building design/orientation as well as appliances and technology. Phase 1/Phase 2 is proposing solar panels, and this component would implement the Community Plan recommendation. In addition, given certain design features incorporated into Phase 1/Phase 2 (such as the sustainability features, which serve to reduce energy and water consumption), demand on public facilities, and services such as energy, water, and solid waste disposal would be minimized to the maximum extent feasible.

Through the enhanced pedestrian environment, sustainable building features, and attention to architectural design and scale, Phase 1/Phase 2 would implement the applicable goals and objectives of the General Plan and La Jolla Community Plan. Because Phase 1/Phase 2 would not conflict with the environmental goals, objectives, and recommendations in the General Plan or the La Jolla Community Plan, no impacts would result. Phase 1/Phase 2 would also be consistent with the applicable policies and recommendations regarding scale and bulk for
development in and adjacent to residential neighborhoods. These issues are discussed further in other sections of this EIR, particularly in Chapter 3.0, Project Description, and Section 4.12, Visual Effects and Neighborhood Character.

**La Jolla Shores Planned District Ordinance**

**Base Zone – Permitted Uses**

Section 1510.0302 of the LJSPD, the Permitted Use Regulations, state:

> The intent of these regulations is to preserve and enhance the environmental quality of La Jolla Shores Area as a place to live. A variety of housing types including single and multiple family units, motels and hotels supported by the necessary public facilities should be encouraged. The development of the businesses necessary to serve the residents and visitors to the area will be permitted in a compact and centrally located commercial area. Large high-rise buildings, out of scale with other structures within the community as well as automobile drive-in and drive-through establishments will be prohibited.

LJSPD regulations provide additional information on permitted or allowable uses. Specifically, Municipal Code Section 1510.0303(e) addresses Single-Family Zone–Permitted Uses, listing “churches, temples, or buildings of a permanent nature, used primarily for religious purposes” as a permitted use. Phase 1/Phase 2 would provide staff offices and a larger meeting space for religious programs related to Jewish holidays and festivals, the study of Jewish texts, as well as other functions that Hillel considers essential to Jewish religion, identity, and living. As outlined in the project description, the project proposes a facility that would be used primarily for religious purposes. Therefore, as a “building[s] of a permanent nature, used primarily for religious purposes” the project would be a permitted use within residential zone in accordance with this section of the City Municipal Code. Therefore, Phase 1/Phase 2 would be consistent with the zoning of the LJSPD Ordinance.

**Base Zone - Development Regulations**

With the requested deviation described above under Section 4.1.3, Phase 1/Phase 2 would comply with all other applicable Municipal Code and development regulations. Development within La Jolla Shores must comply with requirements for density and coverage maximums, 30-foot height maximums, setbacks, and landscaping (see Municipal Code Section 1510.0304 – Single Family Zone-Development Regulations).

**Density:** As detailed in Municipal Code Section 1510.0304(a), “in the following Single-Family Zone…no lot or parcel shall be developed or occupied by more dwelling units than the average dwelling unit density (units per acre) of the developed SF Zone within 300 feet of the subject lot or parcel.” The Phase 1/Phase 2 project does not propose any dwelling units, and thus would be consistent with this requirement.
Siting of Buildings: Figure 4.1-1 shows the setbacks of Phase 1/Phase 2 as compared to surrounding structures. As detailed in Municipal Code Section 1510.0304(b)(1), "Buildings with openings (i.e., doors and/or windows) facing the side property line shall be constructed not closer than four feet from said property line." As shown on Figure 4.1-1, the four-foot side yard setback would be adhered to at the northern frontage of the site.

The project site is not adjacent to a public park, and thus would comply with Municipal Code Section 1510.0304(b)(3). As detailed in Municipal Code Section 1510.0304(b)(4), “building and structure setbacks shall be in general conformity with those in the vicinity.” As shown in Figure 4.1-1, the approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.

Maximum Height: As detailed in Municipal Code Section 1510.0304(c), “No building or structure shall be erected, constructed, altered, moved, or enlarged to a greater height than 30 feet.” Phase 2 building heights would range from 18 to 28 feet, and thus would be less than the 30-foot maximum.

Maximum Lot Coverage: As detailed in Municipal Code Section 1510.0304(d), “No building or structure shall be erected, constructed, altered, moved in, or enlarged to cover more than 60 percent of the lot or parcel.” As previously detailed in Chapter 3.0, Project Description, the existing Phase 2 site area, without the proposed ROW vacation and dedication, is 15,350 square feet. The proposed Phase 2 site area, with the proposed ROW vacation and dedication, would total 33,541 square feet. The proposed lot coverage for Phase 2, with the landscaped area, would be 15.8 percent (5,291 square feet divided by 33,541 square feet). The lot coverage without the landscaping would be 22.5 percent. Thus, the Phase 1/Phase 2 project would comply with the maximum lot coverage requirement.

There are no specific tract requirements for the Phase 1/Phase 2 site (Municipal Code Section 1510.0304(e)). Off-street parking, signs, and landscaping regulations (Municipal Code Sections 1510.0304(f–h)) are discussed below in the La Jolla Shores Design Manual section.

La Jolla Shores Design Manual

Phase 1/Phase 2 would be in conformance with the La Jolla Shores Design Manual, as detailed below. A detailed discussion of the aesthetical components, bulk and scale, and visual simulations of Phase 1/Phase 2 are contained within Section 4.12, Visual Effects and Neighborhood Character.

General Design Guidelines: The guidelines state: “to conserve important design character in La Jolla Shores, some uniformity of detail, scale, proportion, texture, materials, color and building form is necessary.” The proposed HCJL under Phase 1/Phase 2 would conform to these concepts of scale, environmental quality, preservation of character, harmony, originality and diversity, color, roof materials, and exterior wall materials. The plan proposes predominately one-story buildings, with the two-story section of the HCJL Center building relating to the
existing two-story residence directly across La Jolla Scenic Drive. Stucco and natural materials are proposed for the exterior, and the roof forms would be residential in character and scale, consistent with the Design Manual. The siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would provide uniformity in scale and building form while also reducing the overall footprint. The siting of the three buildings would also create better harmony with the single-family residences within the surrounding neighborhood. The almost interlocking form of the three structures and their rhythmic sloping rooflines, glazing placement, and patterned use of stone veneer with earth-toned stucco and concrete surfaces, would yield a well-organized visual appearance. The following subsections discuss the design guidelines in greater detail.

- **Grading:** The guidelines state that development should “preserve natural land forms. Where grading is necessary the slopes should be contour graded and landscaped. Decrease to the extent possible, the necessity of grading and the creation of large level land areas.” The site is predominately flat, with manufactured slopes at the north and east property edges. Phase 1/Phase 2 has been designed to preserve and enhance the natural environment of the site. The principles of a development that result in minimum disturbance, contouring, and other concepts of sensitive grading have been incorporated in the design.

- **Lighting:** The guidelines state that “lighting of pedestrian walks, plazas, and buildings should be well [lit] with numerous small fixtures.” The public areas, parking, and pedestrian access points would be illuminated with warm, simple lighting. This would be done with small fixtures, and lighting would be shaded to prevent light spillover and sources from being seen on adjoining properties.

- **Landscaping:** The guidelines state that the landscaping “design should take into consideration and be compatible with the shape and topography of the area, the architecture of the project, the architectural characteristics of adjacent landscaping and topography.” Landscaping would be integrated into the design in order to provide a sense of nature, improve an area of poor visual quality (the corner at Torrey Pines Road and La Village Drive), and screen uses. Open space would also be integrated into the design to give the neighborhood an identity and visual focus. The landscaping for Phase 2 (see Figures 3-10 and 3-11) would provide further organization of the site through selective placement of shade trees, flowering shrubs, and screening vegetation, and through the patterned provision of street trees along the north, east, and south street frontages. The street trees would be Torrey pines planted at regular intervals, thus maintaining continuity with the Torrey pines theme of the LJSPD area.

- **Off Street Parking:** Off-street parking would be provided according to standards set by and the Traffic Impact Analysis (see Appendix B), which was in turn approved by the City of San Diego Development Services Department. Parking areas would be screened from view by low walls and native landscaping.
Residential and Visitor Areas: The intent of this section in the Design Manual is to preserve and enhance the environmental quality of La Jolla Shores as a place to live. The following subsections discuss the design guidelines in greater detail.

- **Building Heights and Lot Coverage:** Phase 1/Phase 2 would adhere to the height limit of 30 feet and maximum 60 percent lot coverage. Height has been determined from pre-existing grade.

- **The House:** The Design Manual has numerous guidelines for houses, including: fit house to the land, attention to property lines, privacy, harmonious form relationships, consistency, variety, setbacks, compatibility with adjacent development, unity provided by orientation and related shapes, use of combination of acceptable roof forms, and roof material (copper).

This section of the Design Manual does not provide specific guidance for non-residential use. However, the section contains guidelines for higher-density residential buildings, such as apartments, in order to better blend in within a single-family residential zone. Thus, this portion of the guidelines would be applicable to Phase 1/Phase 2. As discussed above, the siting of the three buildings would create better harmony with the single-family residences within the surrounding neighborhood. Specifically, Phase 1/Phase 2 has been designed to present less apparent bulk, and the materials would blend the buildings in with surrounding neighborhood. As detailed above, the use of landscaping would serve to buffer Phase 1/Phase 2 from the adjacent neighborhood. The roofs of each building would not be “simple shapes”, as in the guidelines for residential roofs. However, the Design Manual also states that form consistency shall be a determining factor for design consideration, i.e., roof forms on any given street will be required to be "compatible" with roof forms on neighboring buildings. The sloped rooflines of Phase 1/Phase 2 would reflect common elements of design within both the LJSPD and neighborhood.

- **Street Environment:** The Design Manual states: "Reduce pavement width where possible to bring the street into a better scale relationship to the houses." This principle would be adopted into Phase 1/Phase 2 with the design of the reconfigured La Jolla Scenic Drive. As recommended by the Design Manual, Phase 1/Phase 2 would provide the maximum street tree planting. The Design Manual states “design all curves, intersections and cul-de-sacs and their relationships to houses for the best visual effect.” The cul-de-sac along the west end of the east-west trending La Jolla Scenic Drive North would be vacated, thus providing a better visual effect.

- **Signs:** Other than secondary way-finding signs, the only signs envisioned by the proposed design are a ground sign integrated with the retaining wall at the corner of La Jolla Scenic Way and La Jolla Village Drive, and a wall sign identifying the building near the entrance. These signs would comply with the Design Manual and LDC.
Overall, Phase 1/Phase 2 would comply with the multiple components of the La Jolla Shores Design Manual. The buildings associated with Phase 1/Phase 2 would blend in with existing surrounding development—but would also present a varied architectural style—in conformance with the "unity with variety" principle of the Design Manual. Therefore, impacts would be less than significant.

**Compatibility with Surrounding Land Uses**

The project site is located near several types of land uses. Detached single-family residences, mostly one-story and built in the late 1950s, lie to the south, separated by La Jolla Scenic Drive North. West of the project site, across Torrey Pines Road, lies vacant land that is planned and permitted for institutional uses (owned by UCSD). To the north of the project site lies the six-lane La Jolla Village Drive, and to the north of it the La Jolla Playhouses and UCSD Campus. The Mandell-Weiss Theatre and Forum and Potiker Theatre are the UCSD structures closest to the project site. A two-story, attached, single-family development, built in the mid-1970s, lies across La Jolla Scenic Way to the east.

On a day to day basis, typical site activities would consist of small religious study groups, lectures, morning prayers, meetings, Jewish student leadership programs, student computer access, and general administrative activities. On occasion, such as the beginning of a semester, events would be hosted in the HCJL that could accommodate up to 50 people. As discussed in Chapter 3.0, Project Description, the HCJL is intended as a space for learning, community-building, and spiritual counseling. Based on the size of the facility and the hours of operation, total expected visitors are not anticipated to exceed 100 people over the course of a single day. The activities would not result in significant direct or secondary environmental effects. The three buildings would conform to regulated height maximums and with existing heights in the surrounding area, and the central courtyard serves to minimize the scale of the total development footprint.

In addition to the on-site staff, students would be at the facility, mostly during daytime and evening hours; the HCJL would operate Monday–Friday, 9:00 a.m. to 10:00 p.m. and as needed on weekends. As detailed in Section 4.2, 80 percent of those using the facilities would either walk or use a bicycle to access the site, thus limiting vehicular noise. The 20 percent of trips to the three buildings that would be taken by vehicles would be from La Jolla Scenic Way, thereby causing minimal nuisance to surrounding residential areas (see Section 4.2). Because the Phase 1/Phase 2 project has been designed to blend in with the single-family residential character, it would not generate large amounts of visitors except on rare special occasions as detailed in Section 3.4.2.1(a). Thus, the Phase 1/Phase 2 project would be compatible with surrounding land uses. Impacts would be less than significant.

**b. Existing with Improvements**

Because only minor modifications are proposed to the Cliffridge property, the Existing with Improvements option would not conflict with the applicable goals and objectives of the General
Plan and La Jolla Community Plan. The Cliffridge property is not located on an environmentally sensitive area, coast/shoreline, or steep hillside; therefore, elements of the community plan and ordinance most relevant to the project are related to the residential character of the project site. The design and exterior of the property is compatible with adjacent residential units and would remain the same; thus, this option would not conflict with the La Jolla Shores Design Manual. Because the Existing with Improvements option would not conflict with the environmental goals, objectives, and recommendations in the General Plan or the La Jolla Community Plan, no impact would result.

The Existing with Improvements option involves the permanent use of the Cliffridge property for the Hillel administrative offices for religious uses, which is an allowable use. Therefore, the Existing with Improvements option would be consistent with the zoning of the LJSPD.

Except for the requested deviation described above under Section 4.1.3 to accommodate all required parking on-site, the Existing with Improvements option would comply with all other applicable Municipal Code and development regulations. As discussed in Chapter 3, Project Description, the facility is intended as a space for learning, community-building, and spiritual counseling. Based on the existing size of the property, the activities would not result in significant direct or secondary environmental effects. Therefore, impacts would be less than significant.

4.1.4.2 Significance of Impacts

a. Phase 1/Phase 2

Implementation of Phase 1/Phase 2 would not result in a significant land use conflict as it would be consistent with the land use designation, goals, and policies for the applicable community plan, LJSPD ordinance, La Jolla Shores Design Manual, and development regulations. Based on the type of use which is permitted in this single-family zone and because it would also be compatible with surrounding land uses, no direct or secondary effects would result; therefore, impacts would be less than significant.

b. Existing with Improvements

Implementation of the Existing with Improvements option would not result in a significant land use conflict. The permanent use of the Cliffridge property by Hillel would be consistent with the land use designation, goals, and policies for the applicable community plan, LJSPD ordinance, and development regulations. Proposed improvements would bring the Cliffridge property up to compliance with the Municipal Code. Thus, the land use would be permitted in this single-family zone and also compatible with surrounding land uses. Therefore, no direct or secondary effects would result; impacts would be less than significant.
4.1.4.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements

No mitigation is required.
4.2 Transportation/Circulation/Parking

The following traffic discussion is summarized from the Traffic Impact Analysis prepared by Linscott, Law & Greenspan Engineers (LLG). The complete technical report is included in Appendix B of this EIR, and is based on the City’s Traffic Impact Study Manual.

4.2.1 Existing Conditions

4.2.1.1 Local Circulation System

The study area is shown in Figure 4.2-1 and was determined pursuant to City guidelines and staff consultation. As shown in Figure 4.2-1, the study area includes several major roadways and signalized and unsignalized intersections.

a. Street Segments

Brief descriptions of the roadways within the study area as shown in Figure 4.2-1 are provided below.

**La Jolla Village Drive** – La Jolla Village Drive is classified as a 6-Lane Primary Arterial from Torrey Pines Road to I-5 in the La Jolla Community Plan. It is currently built as a six-lane divided roadway from I-5 to La Jolla Scenic Way, a six-lane undivided roadway with a striped median from La Jolla Scenic Way to Torrey Pines Road, and a four-lane divided roadway northwest of Torrey Pines Road. The intersections of La Jolla Village Drive with both Torrey Pines Road and La Jolla Scenic Way are signalized and the intersection of La Jolla Village Drive with Gilman Drive is grade-separated. The posted speed limit is 45 miles per hour (mph).

**La Jolla Scenic Way** – La Jolla Scenic way is classified as a 2-Lane Collector in the La Jolla Community Plan. It is currently a four-lane divided roadway for approximately 250 feet between La Jolla Village Drive and La Jolla Scenic Drive North before it transitions into La Jolla Scenic Drive North. La Jolla Scenic Way will provide access to the project via a right-in/right-out driveway. The intersection of La Jolla Scenic Way and La Jolla Village Drive is signalized. The posted speed limit is 30 mph.

**La Jolla Scenic Drive North** – La Jolla Scenic Drive North is classified as a 2-Lane Collector in the La Jolla Community Plan. Along the southern frontage of the project site, it is a local roadway. It is currently striped as a three-lane roadway just south of La Jolla Scenic Way and then transitions to a two-lane roadway further south with a curb-to-curb width that varies between 75 feet and 85 feet. The intersection of La Jolla Scenic Drive North and La Jolla Scenic Way is unsignalized. The posted speed limit is 30 mph.
Torrey Pines Road – Torrey Pines Road is classified as a 4-Lane Major Street in the La Jolla Community Plan. It is currently a four-lane undivided roadway. The intersection of Torrey Pines Road and La Jolla Village Drive is signalized. The posted speed limit is 45 mph.

Cliffridge Avenue – Cliffridge Avenue is a two-lane undivided local roadway with no pavement markings or posted speed limit. The intersection of Cliffridge Avenue and La Jolla Scenic Drive North is unsignalized with a stop control on Cliffridge Avenue.

Existing Levels of Service

Figure 4.2-2 shows existing average daily traffic (ADT) volumes on street segments within the study area. Traffic volumes are based on daily roadway traffic counts conducted in February 2010 for the study area while UCSD and public schools were in session.

The levels of service (LOS) for these roadways are shown in Table 4.2-1 and were calculated based on the most recent City Roadway Classification Table for each roadway classification. LOS A through D are considered acceptable for urbanized areas where further improvement in LOS is not feasible or practical. As shown in Table 4.2-1, all study area street segments currently operate at acceptable LOS (i.e., LOS D or better) except for:

- La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way (LOS E)
- Torrey Pines Road between La Jolla Village Drive and Glenbrook Way (LOS E)

**TABLE 4.2-1** EXISTING SEGMENT OPERATIONS

<table>
<thead>
<tr>
<th>Segment</th>
<th>LOS E</th>
<th>Volume</th>
<th>V/C</th>
</tr>
</thead>
<tbody>
<tr>
<td>La Jolla Village Drive</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Expedition Way to Torrey Pines Road</td>
<td>40,000</td>
<td>32,570</td>
<td>D 0.814</td>
</tr>
<tr>
<td>Torrey Pines Road to La Jolla Scenic Way</td>
<td>45,000</td>
<td>44,790</td>
<td>E 0.995</td>
</tr>
<tr>
<td>La Jolla Scenic Way to Gilman Drive</td>
<td>60,000</td>
<td>49,200</td>
<td>C 0.820</td>
</tr>
<tr>
<td>Torrey Pines Road</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>La Jolla Village Drive to Glenbrook Way</td>
<td>30,000</td>
<td>26,740</td>
<td>E 0.891</td>
</tr>
<tr>
<td>La Jolla Scenic Way</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>La Jolla Village Drive to La Jolla Scenic Drive North</td>
<td>15,000</td>
<td>10,090</td>
<td>D 0.673</td>
</tr>
<tr>
<td>La Jolla Scenic Drive North</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cliffridge Avenue to La Jolla Scenic Way</td>
<td>2,200</td>
<td>1,320</td>
<td>Better than C N/A</td>
</tr>
</tbody>
</table>

aCapacities based on City Roadway Classification Table
bADT volumes
cLa Jolla Scenic Way has a curb-to-curb width varying between 75–85 feet with a striped center median. Therefore, a capacity of 15,000 was used in the analysis.
dNon Circulation Element Residential Collector capacity of LOS C threshold of 2,200 was used.
b. Intersections

Figure 4.2-1 shows the locations, configurations, and controls of the five study area intersections, and Figure 4.2-2 shows their existing peak hour traffic volumes. Access to Phase 1/Phase 2 would be provided via a right-in/right-out driveway on La Jolla Scenic Way. Access to the Existing with Improvements option would be provided via a new driveway from the cul-de-sac at La Jolla Scenic Drive North.

**Existing Levels of Service**

For intersections, the LOS rating is a qualitative description that is reported using an A through F letter rating system to describe travel delay and congestion. LOS A indicates free flow conditions with little or no delay and LOS F indicates congested conditions with excessive delays and long back-ups.

Table 4.2-2 shows the existing study area intersections LOS for the AM and PM peak hours. These values were calculated using Highway Capacity Manual procedures. As indication, all study intersections currently operate at an acceptable LOS (LOS D or better).

**TABLE 4.2-2**

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Control Type</th>
<th>Peak Hour</th>
<th>Delay^a</th>
<th>LOS^b</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>La Jolla Village Drive/Torrey Pines Road</td>
<td>Signal</td>
<td>AM</td>
<td>21.6</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM</td>
<td>33.1</td>
<td>C</td>
</tr>
<tr>
<td>2</td>
<td>La Jolla Village Drive/La Jolla Scenic Way</td>
<td>Signal</td>
<td>AM</td>
<td>15.2</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM</td>
<td>20.8</td>
<td>C</td>
</tr>
<tr>
<td>3</td>
<td>La Jolla Scenic Drive North/Cliffridge Avenue</td>
<td>OWSC^c</td>
<td>AM</td>
<td>8.6</td>
<td>A</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM</td>
<td>8.6</td>
<td>A</td>
</tr>
<tr>
<td>4</td>
<td>La Jolla Scenic Way/La Jolla Scenic Drive North</td>
<td>OWSC</td>
<td>AM</td>
<td>14.0</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM</td>
<td>12.3</td>
<td>B</td>
</tr>
<tr>
<td>5</td>
<td>La Jolla Scenic Drive North/Caminito Deseo</td>
<td>Uncontrolled^d</td>
<td>AM</td>
<td>13.7</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>PM</td>
<td>12.7</td>
<td>B</td>
</tr>
</tbody>
</table>

^aAverage delay expressed in seconds per vehicle
^bLevel of Service
^cOWSC – One-Way Stop Controlled intersection. Minor street delay reported.
^dThis intersection is currently uncontrolled. However, Caminito Deseo was analyzed as the minor street stop-controlled movement since vehicles utilizing this movement were observed to stop.

### 4.2.1.2 Alternative Transportation

#### a. Existing Bicycle and Pedestrian Network

Based on field observations, there are currently Class II bicycle facilities provided along La Jolla Village Drive and Torrey Pines Road within the study area. However, no bicycle facilities are provided along La Jolla Scenic Way and La Jolla Scenic Drive. Based on field observations within the study area, the following pedestrian conditions are noted:
La Jolla Village Drive – Contiguous sidewalks are provided along the north and south sides of La Jolla Village Drive. The intersections of La Jolla Village drive at La Jolla Scenic Way and Torrey Pines Road provide controlled pedestrian crosswalks and are greatly utilized by UCSD patrons. Street crossing maneuvers are limited to two crosswalks at each three-legged intersection to reduce the potential for pedestrian/vehicular conflicts along this busy corridor and to most efficiently manage the signal timing.

A pedestrian pathway connects the UCSD campus to the La Jolla Village Drive/Torrey Pines Road intersection. This pathway is located in close proximity to the vacant site associated with Phase 1/Phase 2 and would provide a direct connection for pedestrians between campus and the project site.

Torrey Pines Road – Contiguous sidewalks are provided along the east and west sides of Torrey Pines Road.

La Jolla Scenic Way – A contiguous sidewalk is provided along the east side of La Jolla Scenic way; however, no sidewalk is provided along the westerly portion.

La Jolla Scenic Drive – South of the La Jolla Scenic Drive North/La Jolla Scenic Way intersection, contiguous sidewalks are provided continuously along both sides of the roadways.

La Jolla Scenic Drive North – A contiguous sidewalk is provided along the south side of La Jolla Scenic Drive North; however, no sidewalk is currently provided along the northerly portion.

UCSD Bicycle and Pedestrian Master Planning Study

In April 2012, UCSD published a Bicycle and Pedestrian Master Planning Study (BPMPS). This document was prepared to guide design and implementation of mobility infrastructure and programs as the campus population grows and facilities are planned and sited. According to the UCSD Survey of Pedestrian and Vehicle Traffic sourced in the BPMPS, winter 2011 data indicated that cyclists and pedestrians represent 2.8 percent and 8.0 percent of all persons entering UCSD, respectively, making their combined mode share 10.8 percent. According to the survey, the campus entrances with the largest number of cyclists and pedestrians are Torrey Pines Road, Gilman Drive, and La Jolla Shores Drive.

In addition to the collection of existing bike/pedestrian transportation mode data, a safety analysis was conducted. Data on all reported cyclist-vehicle and pedestrian-vehicle collisions within one mile of the UCSD campus between January 1, 2008 and December 31, 2010 was accessed from the California Highway Patrol’s Statewide Integrated Traffic Records System (SWITRS). Within the period, one pedestrian collision was documented at the La Jolla Village Drive/Torrey Pines Road intersection, and two bicycle collisions were documented at the at the La Jolla Village Drive/La Jolla Scenic Drive North intersection, representing a relatively low occurrence of collisions.
An online opinion survey was prepared for the BPMPS and was completed by over 2,000 students, faculty, and staff. This information was used to augment the collision data, as respondents felt the SWITRS data underreported safety hazards around the campus. Respondents did not express safety concerns regarding the La Jolla Village Drive intersections with Torrey Pines Road and La Jolla Scenic Drive North.

b. Existing Transit Conditions

Based on a review of the most recent information on the San Diego Metropolitan Transit System website, the following transit conditions are noted.

Current local bus and express bus transit service is provided in the La Jolla Community via Routes 30, 41, 101, 921, and 150. A bus stop is located on the south side of La Jolla Village Drive adjacent to the project site (that is proposed to remain with either the Phase 1/Phase 2 or the Existing with Improvements option). The UCSD campus has an on-site Campus Loop Shuttle system that runs weekdays from 7:00 a.m. to midnight and weekends from 9:00 a.m. to 8:00 p.m. Frequencies of pick-ups vary by the hour of the day, and range between 10 minutes to 20 minutes. The UCSD Loop shuttles also extend further out from campus and operate as the City, Coaster, East/Regents, Hillcrest/Campus, Mesa Housing, Sanford Consortium, and Scripps Institute of Oceanography shuttles.

In addition, shuttle service is provided to connect the University Town Center (UTC) Transit Center to UCSD via the Metropolitan Transit System SuperLoop on Routes 201 and 202 that runs an average of every 10 minutes during peak hours and 15 minutes during non-peak hours (between 9:00 a.m. and 3:00 p.m. and in the evening). Transfer service is available from the UTC Transit Center to additional transit routes serving the greater San Diego area.

4.2.2 Significance Determination Thresholds

Based on the City’s 2011 Significance Determination Thresholds, impacts related to transportation, circulation, and parking would be significant if the project would:

- Result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system;

- Result in an increased demand for off-site parking or substantially affect the availability of existing parking in an adjacent residential area, including the availability of public parking; and/or

- Result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to a proposed non-standard design feature.
Specifically, direct, near-term, and long-term cumulative impacts related to traffic circulation would be significant if:

- Any intersection, roadway segment, or freeway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the thresholds shown in Table 4.2-3.

- A project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g., poor sight distance, proposed driveway onto an access-restricted roadway).

- A project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, and would not properly align with other existing or planned roadways.

- A project would result in a substantial restriction in access to publicly or privately owned land.

**TABLE 4.2-3**

CITY OF SAN DIEGO TRAFFIC IMPACT SIGNIFICANCE THRESHOLDS

<table>
<thead>
<tr>
<th>LOS with Project ²</th>
<th>Freeways</th>
<th>Roadway Segments</th>
<th>Intersections</th>
<th>Ramp Metering³</th>
</tr>
</thead>
<tbody>
<tr>
<td>E (or ramp meter delays above 15 minutes)</td>
<td>0.010</td>
<td>1.0</td>
<td>0.02</td>
<td>1.0</td>
</tr>
<tr>
<td>F (or ramp meter delays above 15 minutes)</td>
<td>0.005</td>
<td>0.5</td>
<td>0.01</td>
<td>0.5</td>
</tr>
</tbody>
</table>

²If a project’s traffic causes the values shown in the table to be exceeded, the impacts are determined to be significant. The project applicant shall then identify feasible improvements (within the Traffic Impact Study) that will restore and maintain the traffic facility at an acceptable LOS. If the LOS with the project becomes unacceptable (see note b), or if the project adds a significant amount of peak-hour trips to cause any traffic queues to exceed on- or off-ramp storage capacities, the project applicant shall be responsible for mitigating the project’s direct significant and/or cumulatively considerable traffic impacts.

³All LOS measurements are based upon Highway Capacity Manual procedures for peak-hour conditions. However, V/C ratios for roadway segments are estimated on an ADT/24-hour traffic volume basis (using Table 2 of the City’s Traffic Impact Study Manual). The acceptable LOS for freeways, roadways, and intersections is generally “D” (“C” for undeveloped locations). For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive.

³The allowable increase in delay at a ramp meter with more than 15 minutes of delay and freeway LOS E is 2 minutes and at LOS F is 1 minute.
4.2.3 Issue 1: Local Street System

Would the project result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system?

4.2.3.1 Impacts

a. Phase 1/Phase 2

*Project Traffic*

*Project Trip Generation*

There are no local or national established trip generation rates for a facility such as this project. Under such circumstances, the City and industry standard is to conduct a site-specific trip generation study. In addition, historical use data compiled from programming at the existing Hillel facility, along with a survey of student participants was used to substantiate the trip generation rate and mode-share assumptions developed for the project. Historical site-specific data from the existing Hillel center (both the Cliffridge property and the existing on-campus space) indicate that many current patrons walk from UCSD to attend the programs held at the Cliffridge property. These programs would be similar to anticipated programs to be held at the proposed facility. Additional surveys were conducted at comparable Hillel facilities around California including: Therefore, surveys were conducted by the applicant to determine the number of patrons who would walk to the site instead of drive: one among the students who currently attend Hillel-related activities at the UCSD campus, one at the existing University of California, Los Angeles (UCLA) Hillel facility, and one at the University of California, Santa Barbara (UCSB) Hillel center. Due to these facilities being situated in such close proximity to campus as the project (directly adjacent to campus), they are good candidates from which to collect trip generation data. In addition, to determine appropriate parking generation rates (see Section 4.2.4, below), surveys were also conducted at UCSD, UCLA, UCSB, and California State University, Northridge (CSUN).

**UCSD:** The existing Hillel center occupies the Cliffridge property and utilizes multipurpose space on the UCSD campus (location of on-campus events differ based on availability). A historical monthly program guide was provided by the applicant indicating the dates and times of the social events. Shabbat services typically held on Friday evenings are held on campus at the UCSD International Center, and are therefore not included in the trip generation results. The UCSD survey collected responses from 115 students. The results of this survey found that approximately 80 percent of the students stated that they would walk to the Hillel facility at its proposed location. Of the 20 percent that suggested they would drive to the facility, just over half of those students responded that they would carpool.

**UCLA:** The UCLA Hillel facility is located approximately the same distance from the university campus as the Phase 1/Phase 2 project. The survey and parking demand count conducted in
March 2010 was conducted over the course of one week with a sample size of 40 to 50 students depending on the day data was collected. Data was collected on program attendance, mode of transportation to the site, and parking occupancy counts. The results of the data collected show that on average about 33 students occupied the center at one time. Of those students, 93 percent of the students attending Hillel programs walked to the existing facility while 7 percent drove. Of the students driving to the site, 100 percent of those trips were carpool trips.

The UCLA Hillel currently provides 13 parking spaces; however, they are primarily reserved for the 13-14 staff members that may be on-site at any given time. The results of the parking occupancy counts show a general correlation to the number of staff on-site and the number of spaces occupied. For example, when 12 staff are on-site at the facility, 12 parking spaces were counted as occupied, indicating that the facility has an adequate parking supply. Due to the student carpool, only one student vehicle was parked at the site.

**UCSB:** The UCSB Hillel is located just off campus (approximately two to three blocks) in the Isla Vista community, which is predominately a student housing area. The UCSB Hillel Student Center is approximately 10,000 square feet. The program log offered at this location is also similar to the UCSD Hillel with the exception of Friday night Shabbat services, which are held on-site. Data collection similar to the UCLA survey was conducted at this location over the course of one week during October 2010. The UCSB survey had a sample size of a maximum of 40 students depending on the day data was collected. The results of the survey show that on average about 34 students occupied the center at one time. Of those 34 students, 84 percent walked to the existing facility while 16 percent drove. Carpool data was not obtained for the approximately six students driving to the site.

The UCSB Hillel currently provides 28 parking spaces open to staff, visitors, and students. Assuming all six staff members are parked on-site at the same time as the six estimated student drivers, adequate parking exists at the facility. A parking occupancy count survey was conducted at this facility and the results show that, at most, 20 cars were counted in the provided parking lot, and adequate parking is available to serve the UCSB Hillel Student Center.

Based on information provided by the applicant, it is expected that with Phase 1/Phase 2, a typical Hillel program would draw between 10 and 30 students and, at most, 50 patrons to the site. However, for the purpose of being more conservative in the trip generation (and parking) analysis, assumptions for this report focus on a maximum of 100 persons were assumed to arrive at the project site during the peak timeframe of programs and events at the facility, which would be expected to occur midday between 10:00 a.m.–2:00 p.m. An additional 100 ins and 100 outs were spread throughout the remaining off peak hours based on the expected attendance data from the UCSD and UCLA surveys. Therefore, a total of 200 patrons throughout the daily hours of operations average daily trips was the basis for the evaluation of traffic impacts.
A historical monthly program guide was provided by the applicant indicating the dates and times of the social events to be held at the proposed facility. The hours of operations proposed are between 9:00 a.m. and 10:00 p.m. Monday through Friday. Shabbat services typically held on Friday evenings would continue to be held on campus at their current location, the UCSD International Center, and are therefore not included in the trip generation assumptions. Typical site activities would consist of small study groups, lectures, meetings, student computer access, and general administrative activities, the majority of which do not occur during the typical AM and PM peak hours (7:00 a.m. to 9:00 a.m. and 4:00 p.m. to 6:00 p.m.). As previously mentioned, all events are proposed to take place at the new facility except for the Shabbat services, and other larger gatherings, which will continue to be held at the UCSD International Center.

As previously mentioned, many users of the facility would come from UCSD, just north of the current Hillel Facility along La Jolla Village Drive. It is also expected that many patrons of the facility would walk from UCSD to attend the programs held at the site. Surveys were conducted at UCSD, UCLA, and UCSB to estimate the percent of patrons who would walk to Hillel sites from campus centers. The results of the three surveys show that the majority of users of the facility currently walk or are expected to walk from their origin to their destination at the Phase 1/Phase 2 site. The three surveys estimated that 87 percent of students currently walk or would walk to reach the facility. Based on the surveys and as a conservative measure, it was assumed that 80 percent of patrons would walk to the site and 20 percent would drive. Of those 20 percent driving to the site, it was assumed the average vehicle occupancy would be two persons per vehicle, based on the survey data collected for UCLA and UCSD. Currently, four staff members work the existing Hillel Center operations. Based on information provided by the applicant, seven staff members would service the proposed facility. For purposes of calculating the trips generated by Hillel staff, it was assumed all seven staff members would drive in individual vehicles to the site.

Table 4.2-4 presents a daily breakdown of student and staff activity on a typical weekday based on a midday arrival of 100 students and arrival and departure patterns derived from the events/program log provided by the applicant. As shown in Table 4.2-4, the project is estimated to generate approximately 58 daily trips with an AM peak hour of seven vehicles and a PM peak hour of eight vehicles.

Figure 4.2-3 shows the expected Phase 1/Phase 2 traffic distribution. Figure 4.2-4 shows the Phase 1/Phase 2-only ADT and peak hour volumes.
TABLE 4.2-4
PHASE 1/PHASE 2 TRIP GENERATION TABLE:
80 PERCENT WALK/20 PERCENT DRIVE SCENARIO

<table>
<thead>
<tr>
<th>Time of Day</th>
<th>Students</th>
<th>Staff</th>
<th>Walk/Bike Trips</th>
<th>Drive Trips</th>
<th>Total Drive Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>In/Out</td>
<td></td>
<td>In/Out</td>
<td>In/Out</td>
<td>In/Out Total</td>
</tr>
<tr>
<td>8:00 – 9:00 a.m.</td>
<td>0/0</td>
<td>7/0</td>
<td>0/0</td>
<td>7/0</td>
<td>7/0</td>
</tr>
<tr>
<td>9:00 – 10:00 a.m.</td>
<td>10/5</td>
<td>0/0</td>
<td>8/4</td>
<td>1/0</td>
<td>1/0</td>
</tr>
<tr>
<td>10:00 – 11:00 a.m.</td>
<td>40/5</td>
<td>0/0</td>
<td>32/4</td>
<td>0/4</td>
<td>32/4</td>
</tr>
<tr>
<td>11:00 – Noon</td>
<td>30/10</td>
<td>0/0</td>
<td>24/8</td>
<td>3/1</td>
<td>3/1</td>
</tr>
<tr>
<td>Noon – 1:00 p.m.</td>
<td>20/30</td>
<td>2/2</td>
<td>16/24</td>
<td>2/3</td>
<td>2/3</td>
</tr>
<tr>
<td>1:00 – 2:00 p.m.</td>
<td>10/30</td>
<td>0/0</td>
<td>8/24</td>
<td>1/3</td>
<td>1/3</td>
</tr>
<tr>
<td>2:00 – 3:00 p.m.</td>
<td>20/20</td>
<td>0/0</td>
<td>16/16</td>
<td>2/2</td>
<td>2/2</td>
</tr>
<tr>
<td>3:00 – 4:00 p.m.</td>
<td>10/10</td>
<td>0/0</td>
<td>8/8</td>
<td>1/1</td>
<td>1/1</td>
</tr>
<tr>
<td>4:00 – 5:00 p.m.</td>
<td>5/0</td>
<td>0/0</td>
<td>4/0</td>
<td>0/0</td>
<td>4/0</td>
</tr>
<tr>
<td>5:00 – 6:00 p.m.</td>
<td>10/20</td>
<td>5/5</td>
<td>8/16</td>
<td>1/2</td>
<td>1/2</td>
</tr>
<tr>
<td>6:00 – 7:00 p.m.</td>
<td>30/5</td>
<td>0/0</td>
<td>24/4</td>
<td>3/1</td>
<td>3/1</td>
</tr>
<tr>
<td>7:00 – 8:00 p.m.</td>
<td>10/25</td>
<td>0/0</td>
<td>8/20</td>
<td>1/3</td>
<td>1/3</td>
</tr>
<tr>
<td>8:00 – 9:00 p.m.</td>
<td>5/30</td>
<td>0/2</td>
<td>4/24</td>
<td>1/3</td>
<td>1/3</td>
</tr>
<tr>
<td>9:00 – 10:00 p.m.</td>
<td>0/10</td>
<td>0/0</td>
<td>0/8</td>
<td>0/1</td>
<td>0/1</td>
</tr>
<tr>
<td>Total</td>
<td>200/200</td>
<td>9/9</td>
<td>160/160</td>
<td>20/20</td>
<td>29/29 58</td>
</tr>
</tbody>
</table>

aNumber of persons coming into and out of the site, not accounting for mode of access (note: 100 students assumed to arrive at the facility between 10 a.m. and 2 p.m. on a busy day with 100 additional off-peak ins and outs throughout the remainder of the day).

bNumber of students coming into and out of the site either by walk or bike.

 Assumes a student vehicle occupancy rate of two (2) persons per vehicle based on UCSD and UCLA survey data collected.

cAll 7 staff members were assumed to drive alone to the facility.

dAssumes staff members enter and leave the site during the noon to 1:00 p.m. lunch hour.

Shading represent highest project traffic during the peak hours of 7-9 a.m. and 4-6 p.m.

The peak hours for adjacent street traffic occur between 8–9 a.m. and 5–6 p.m. based on counts on La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Drive, over a 24-hour period, as shown in Appendix A of the Traffic Impact Analysis.

### Phase 2 Access

Access to the vacant site associated with Phase 2 would be provided by a right-in/right-out driveway on La Jolla Scenic Way. Outbound traffic oriented to La Jolla Village Drive would need to make a southbound to northbound U-turn at the intersection of La Jolla Scenic Drive North and Caminito Deseo to reach their destination. Therefore, this intersection was specifically analyzed in this study. A field observation of the available turning radius at Caminito Deseo was compared to the required minimum design turning radius for standard passenger vehicles. Based on the field visit under existing roadway conditions, it was observed that more than 40 feet of internal turning radius is available and signage is provided to permit U-turns. Therefore, a U-turn is feasible at this intersection. In addition, Phase 1/Phase 2 would be conditioned to install a stop sign on the Caminito Deseo approach to this intersection.
**Existing Plus Phase 1/Phase 2 Impacts**

An “existing plus project” analysis has been provided for the Phase 1/Phase 2 traffic in response to the recent case of *Sunnyvale West Neighborhood Association v. City of Sunnyvale City Council* (2010). To summarize, this case requires that traffic studies include an additional level of analysis of the potential traffic impacts associated with the proposed project. Specifically, this scenario assumes that the project is constructed and operational under additional traffic conditions (that is without anticipated or proposed road improvements). An “existing plus project” analysis (i.e., if the project were implemented in the present condition), without assuming either additional cumulative projects or additional road improvements in the baseline condition.

**Street Segments**

Figure 4.2-5 shows the existing plus Phase 1/Phase 2 ADT volumes. Table 4.2-5 summarizes the segment operations in the study area for the existing plus Phase 1/Phase 2 condition. As seen in Table 4.2-5, the following study area segments are calculated to operate at LOS E or F with the addition of Phase 1/Phase 2 traffic:

- La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way – LOS E
- Torrey Pines Road between La Jolla Village Drive and Glenbrook Way – LOS E

The volume to capacity (V/C) increase due to the project at these two street segments would not exceed the 0.02 threshold. Therefore, no significant impacts were identified.

**Intersections**

Since many students currently walk to/from the UCSD campus utilizing the intersections of La Jolla Village Drive / Torrey Pines Road and La Jolla Village Drive / La Jolla Scenic Way, the number of pedestrians collected in the peak hour intersection count data were included in the peak hour analysis.
### TABLE 4.2-5
EXISTING PLUS PHASE 1/PHASE 2 SEGMENT OPERATIONS

<table>
<thead>
<tr>
<th>Street Segment</th>
<th>Functional Classification</th>
<th>LOS E Capacity</th>
<th>Existing ADT</th>
<th>Existing LOS</th>
<th>V/C</th>
<th>Existing + Project ADT</th>
<th>Existing + Project LOS</th>
<th>V/C</th>
<th>Δ V/C</th>
<th>Impact Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>La Jolla Village Drive to Torrey Pines Road</td>
<td>4-Ln Major Arterial</td>
<td>40,000</td>
<td>32,570</td>
<td>D</td>
<td>0.814</td>
<td>32,585</td>
<td>D</td>
<td>0.815</td>
<td>0.001</td>
<td>None</td>
</tr>
<tr>
<td>La Jolla Scenic Way to La Jolla Village Drive to Glenbrook Way</td>
<td>4-Ln Collector</td>
<td>30,000</td>
<td>26,740</td>
<td>E</td>
<td>0.891</td>
<td>26,746</td>
<td>E</td>
<td>0.892</td>
<td>0.001</td>
<td>None</td>
</tr>
<tr>
<td>La Jolla Village Drive to La Jolla Scenic Drive North</td>
<td>2-Ln Collector</td>
<td>15,000</td>
<td>10,909</td>
<td>D</td>
<td>0.673</td>
<td>10,148</td>
<td>D</td>
<td>0.677</td>
<td>0.004</td>
<td>None</td>
</tr>
<tr>
<td>La Jolla Scenic Drive North to Cliffridge Avenue to La Jolla Scenic Way</td>
<td>Sub-Collector</td>
<td>2,200</td>
<td>1,320</td>
<td>≥ C</td>
<td>N/A</td>
<td>1,321</td>
<td>≥ C</td>
<td>N/A</td>
<td>N/A</td>
<td>None</td>
</tr>
</tbody>
</table>

*aCity of San Diego Roadway Capacity Standards.
*bAverage Daily Traffic volumes.
*cLevel of Service
*dVolume to Capacity ratio.
*eIncrease in V/C due to project.
*fLa Jolla Scenic Way has a curb-to-curb width varying between 75-85 feet with a striped center median. Therefore, a capacity of 15,000 was used in the analysis.
*gNon Circulation Element Residential Collector capacity of LOS C threshold of 2,200 was utilized.
*hLa Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way is classified as and built to six-lane Major Arterial standards, with the exception of a raised center median. Therefore, the average capacity between a four-lane and six-lane Major Arterial was used.

Table 4.2-6 summarizes the peak-hour intersection operations for the existing plus project condition. As seen in Table 4.2-6, all key signalized intersections are calculated to operate at LOS C or better conditions with the addition of project traffic.

The critical movements at the unsignalized intersections are calculated to continue to operate at LOS B or better conditions. Since all intersections are calculated to continue to operate at an acceptable LOS C or better with the addition of the project, no significant impacts were identified.
TABLE 4.2-6
EXISTING PLUS PHASE 1/PHASE 2 INTERSECTION OPERATIONS

<table>
<thead>
<tr>
<th>Intersection</th>
<th>Control Type</th>
<th>Peak Hour</th>
<th>Existing</th>
<th>Existing Plus Phase 1/Phase 2</th>
<th>Δ Delay(c)</th>
<th>Impact Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. La Jolla Village Drive/ Torrey Pines Road</td>
<td>Signal</td>
<td>AM</td>
<td>21.6</td>
<td>C</td>
<td>0.0</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>33.1</td>
<td>C</td>
<td>0.0</td>
<td>None</td>
</tr>
<tr>
<td>2. La Jolla Village Drive/ La Jolla Scenic Way</td>
<td>Signal</td>
<td>AM</td>
<td>15.2</td>
<td>B</td>
<td>0.1</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>20.8</td>
<td>C</td>
<td>0.2</td>
<td>None</td>
</tr>
<tr>
<td>3. La Jolla Scenic Drive North/ Cliffridge Way</td>
<td>OWSC</td>
<td>AM</td>
<td>8.6</td>
<td>A</td>
<td>0.0</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>8.6</td>
<td>A</td>
<td>0.0</td>
<td>None</td>
</tr>
<tr>
<td>4. La Jolla Scenic Way/ La Jolla Scenic Drive</td>
<td>OWSC</td>
<td>AM</td>
<td>14.0</td>
<td>B</td>
<td>0.0</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>12.3</td>
<td>B</td>
<td>0.1</td>
<td>None</td>
</tr>
<tr>
<td>5. La Jolla Scenic Drive North/ Caminito Deseo</td>
<td>Uncontrolled</td>
<td>AM</td>
<td>13.7</td>
<td>B</td>
<td>0.0</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>12.7</td>
<td>B</td>
<td>0.1</td>
<td>None</td>
</tr>
</tbody>
</table>

\(a\) Average delay expressed in seconds per vehicle.  
\(b\) Level of Service.  
\(c\) Increase in delay due to project.  
\(d\) OWSC – One-Way Stop Controlled intersection. Minor street delay reported.  
\(e\) This intersection is currently uncontrolled. However, Caminito Deseo was analyzed as the minor street stop-controlled movement since vehicles utilizing this movement were observed to stop.

Near-term (Direct) Impacts

The City requires other reasonably foreseeable projects in the nearby area to be included in the near-term analysis in order to account for projects that could be reasonably expected to be open and operating by the project’s expected opening day in Year 2015 (but after existing counts were taken in February 2010). A near-term analysis was conducted to determine impacts that would occur when the project becomes operational. As such, the analysis takes into account traffic from any projects anticipated to be operational in the same timeframe as the project. It should be noted that cumulative projects expected in the near-term condition were also included in the Year 2030 long-term conditions. Development projects in the nearby area were included in the near-term traffic volume forecast:

1. Southwest Fisheries is bound by La Jolla Shores Drive on the west, north, and east sides and Shellback Way on the south, within the UCSD campus in the City of San Diego. The existing site lies along the west side of La Jolla Shores Drive and just north of the Biological Grade Driveway. The project proposes to demolish two (approximately 40,000 square feet) of the four existing structures on the west side of La Jolla Shores Drive and replace them with a new 124,000-square-foot research and development building on the east side of La Jolla Shores Drive, a net increase of 84,000 square feet. The “net” project is calculated to generate 672 ADT, while the “gross” project would generate approximately 992 ADT. This project is approved, but not yet constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.
2. Scripps Hospital CUP III Expansion project involves the demolition, renovation, and construction of new hospital and medical offices at the existing Scripps Memorial Hospital campus site within the University Community Plan Area. Year 2015 (near-term) project trip generation for this project is 3,097 ADT. This project is approved. Therefore, traffic generated by this cumulative project was included in the near-term condition.

3. Salk Institute for Biological Studies is calculated to generate 1,682 ADT. This project is approved, but not yet constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

4. UCSD Long-Range Development Plan (LRDP) includes on-campus projects: East Campus developments such as the Clinical and Technical Research Institute, East Campus Bed Tower, the Sulpizio Cardiovascular Center, and the East Campus Office Building. Based upon discussion with UCSD, it was determined that several potential near-term projects could be constructed and occupied by the time the proposed project comes online in 2015. On the West Campus, UCSD anticipates development of additional on-campus housing units by 2015–2016, although these are anticipated to benefit overall traffic by reducing the amount of non-resident (commuter) students who would otherwise constitute trips on the system. The following are the traffic volumes anticipated to be generated by these projects in the near-term condition:

   a. Clinical and Technical Research Institute is located on the UCSD East Campus Medical Center in the Health Sciences Neighborhood. The project proposes construction of a 360,000-gross-square-foot building. The project trip generation for 360,000 square feet of research and development is 2,880 ADT.

   b. East Campus Bed Tower proposes to expand the existing Thornton Hospital by adding a bed tower with up to 245 beds. The project trip generation assuming a 245-bed development is 4,900 ADT.

   c. Sulpizio Cardiovascular Center opened in 2011 after completion of construction to develop a 125,000-square-foot dedicated cardiovascular patient center. This project generates approximately 823 ADT.

   d. East Campus Office Building is currently under construction and would generate approximately 457 ADT.

5. Venter Institute is located at the southwest corner of the intersection of La Jolla Village Drive and Torrey Pines Road as part of the UCSD campus. The Venter Institute is a 45,000-square-foot scientific research and development center located on Parcel 4 of the Scripps Upper Mesa neighborhood within the Scripps Institute of Oceanography. The Venter Institute has revised the site plan to only provide access to Expedition Way (full access driveway). Access to Torrey Pines Road would be eliminated. The cumulative analysis in this report assumes the trip assignment associated with the full access on
6. La Jolla Medical Building is a redevelopment of the El Torito restaurant located at 8910 La Jolla Village Drive. The project proposes to construct approximately 15,000 square feet of medical office space. The project is estimated to generate approximately 300 ADT. This project is currently under review. Thus, traffic generated by this cumulative project was included in the near-term condition.

7. La Jolla Crossroads II proposes to construct 309 multi-family residences at 9015 Judicial Drive in the community of University City. The project is estimated to generate approximately 1,854 ADT. This project is approved, but not yet under construction. Thus, traffic generated by this cumulative project was included in the near-term condition.

8. Nexus Center is located adjacent to the La Jolla Crossroads project on Judicial Drive and proposes to construct approximately 191,000 square feet of research and development/office space. The project is estimated to generate approximately 1,915 ADT. This project is approved, and is currently under construction. Thus, traffic generated by this cumulative project was included in the near-term condition.

9. Palazzo Condominiums proposes to construct approximately 30 multi-family residences at 2402 N. Torrey Pines Road. The project is estimated to generate approximately 180 ADT. This project is approved, and is currently under construction. Therefore, traffic generated by this cumulative project was included in the near-term condition.

10. La Jolla Centre III proposes to construct approximately 278,800 square feet of commercial office space and is located near the intersections of Judicial Drive, Executive Drive, and Town Centre Drive in the community of University City. The project is estimated to generate approximately 4,162 ADT, with 487 inbound/54 outbound trips during the AM peak hour, and 117 inbound/466 outbound trips during the PM peak hour. This project is approved, but not yet under construction. Thus, traffic generated by this cumulative project was included in the near-term condition.

11. Monte Verde proposes to construct approximately 560 multi-family residences and is located near the intersections of La Jolla Village Drive, Regents Road, and Campus Point Drive in the community of University City. The project is estimated to generate approximately 3,360 ADT. This project is approved, but is not yet constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

12. Scripps Green Hospital proposes to construct approximately 39,024 square feet of hospital land use located on Genesee Avenue north of N. Torrey Pines Road. The project is estimated to generate approximately 780 ADT. This project is approved, but is not yet constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.
13. 9339 Genesee Executive Plaza proposes to convert approximately 22,500 square feet of existing standard commercial office space to medical office space located at 9339 Genesee Avenue in the community of University City. The project is estimated to generate approximately 971 ADT. This project is approved, but is not yet constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

14. Torrey Pines Glider Port Expansion proposes to expand the operations of the existing City Park (glider port) located at 2800 Torrey Pines Scenic Drive in the community of La Jolla. The project is estimated to generate approximately 180 ADT. This project is approved, but is not yet constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

15. UTC Revitalization Project is a Master Development Plan with variable development programs that can respond to changing market conditions and desire of the community of University City. The original project proposed up to 750,000 square feet of retail and 250 dwelling units with several alternative project scenarios based on a trip generation equivalency. The intent of the Master Development Plan is to allow flexibility in the development program while ensuring the alternative project scenarios have been addressed by the analysis of the original project. At a maximum, the project is estimated to generate approximately 21,900 ADT. This project is approved, is partially completed and open, and is currently under construction. Therefore, the completed portion of traffic generated by this cumulative project (assumed 50 percent) was included in the near-term condition.

16. La Jolla Commons III Community Plan Amendment (CPA) proposes land use changes to the current plan for a mixed-use development of a 450,000–square-foot mid-rise office building, a 25-story residential tower with 120 units, a 325-room hotel, other general office development (mainly for scientific research), and open space. The amendment would eliminate the residential uses to increase the Development Intensity Element of the University Community Plan designating this portion of the site to develop as office use, a hotel, or a mix of hotel and office use. The project is bound by Executive Drive, La Jolla Village Drive, and Judicial Drive. One mid-rise office building tower of the project is completed and partially occupied. This project would be expected to generate 10,319 ADT. This project is approved, with the exception of the proposed changes to eliminate the residential uses in the CPA. It would not be expected that traffic generated by this CPA would be on the study area street system by the opening of the proposed project in Year 2015. Therefore, no cumulative project traffic was included in the near-term condition.
Near-term without Phase 1/Phase 2

Street Segments

Figure 4.2-6 shows the near-term ADT volumes (those from the approved/pending projects added to existing ADT volumes). Table 4.2-7 shows the street segment LOS for the existing plus near-term traffic scenario. Under the near-term without project scenario (left half of table), the following segments are calculated to operate at LOS E or F without the project:

- La Jolla Village Drive between Torrey Pines Road to La Jolla Scenic Way (LOS F)
- Torrey Pines Road between La Jolla Village Drive and Glenbrook Way (LOS E)

Intersections

The left half of Table 4.2-8 shows the AM and PM peak hour intersection LOS for near-term without Phase 1/Phase 2. As shown, all key signalized intersections are calculated to operate at LOS D or better with the addition of cumulative projects’ traffic. These existing intersections would be maintained in their current configuration with implementation of Phase 1/Phase 2. The critical movements at the unsignalized intersections are calculated to continue to operate at LOS B or better.

<table>
<thead>
<tr>
<th>Segment</th>
<th>Functional Classification</th>
<th>LOS E Capacity</th>
<th>Near-term Plus Project ADT</th>
<th>Near-term Plus Project LOS</th>
<th>V/C</th>
<th>Δ V/C</th>
<th>Impact Type</th>
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<td>La Jolla Village Drive Expedition Way to Torrey Pines Road</td>
<td>4-Lane Major Arterial</td>
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<td>Torrey Pines Road to La Jolla Scenic Way</td>
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<tr>
<td>La Jolla Scenic Way to La Jolla Village Drive</td>
<td>6-Lane Prime Arterial</td>
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<td>53,617</td>
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<td>4-Lane Collector</td>
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<td>2-Lane Collector</td>
<td>15,000</td>
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<td>1,351</td>
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</table>

aCity of San Diego Roadway Capacity Standards
bAverage Daily Traffic Volumes
cLevel of Service
dVolume to Capacity ratio
еIncrease in V/C due to project
fLa Jolla Scenic Way has a curb-to-curb width varying between 75–85 feet with a striped center median. Therefore, a capacity of 15,000 was used in the analysis.
gNon Circulation Element Residential Collector capacity of LOS C threshold of 2,200 was used.
hLa Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way is classified as and built to six-lane Major Arterial standards, with the exception of a raised center median. Therefore, the average capacity between a four-lane and six-lane Major Arterial was used.
TABLE 4.2-8
NEAR-TERM INTERSECTION OPERATIONS

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Control Type</th>
<th>Peak Hour</th>
<th>Near-term Projects</th>
<th>Near-term with Phase 1/Phase 2</th>
<th>Δ Delay</th>
<th>Impact Type</th>
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<td>Delay</td>
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<td>Delay</td>
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<td>B</td>
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<td></td>
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<td>C</td>
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<tr>
<td>3</td>
<td>La Jolla Scenic Drive North/ Cliffridge Avenue</td>
<td>OWSC&lt;sup&gt;d&lt;/sup&gt; AM</td>
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<td>8.6</td>
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<td>8.6</td>
<td>A</td>
</tr>
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<td>4</td>
<td>La Jolla Scenic Way/ La Jolla Scenic Drive North</td>
<td>OWSC</td>
<td>AM</td>
<td>14.4</td>
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<td>14.3</td>
<td>B</td>
</tr>
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<td></td>
<td>PM</td>
<td></td>
<td>12.7</td>
<td>B</td>
<td>12.6</td>
<td>B</td>
</tr>
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<td>5</td>
<td>La Jolla Scenic Drive North/Caminito Deseo</td>
<td>Uncontrolled&lt;sup&gt;e&lt;/sup&gt; AM</td>
<td>14.1</td>
<td>B</td>
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<td>B</td>
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<tr>
<td></td>
<td></td>
<td>PM</td>
<td></td>
<td>13.1</td>
<td>B</td>
<td>13.1</td>
<td>B</td>
</tr>
</tbody>
</table>

<sup>a</sup>Average delay expressed in seconds per vehicle
<sup>b</sup>Level of Service
<sup>c</sup>Increase in delay due to project
<sup>d</sup>OWSC – One-Way Stop Controlled intersection. Minor street delay reported.
<sup>e</sup>This intersection is currently uncontrolled. However, Caminito Deseo was analyzed as the minor street stop-controlled movement since vehicles utilizing this movement were observed to stop.

**Near-term with Phase 1/Phase 2**

**Street Segments**

Figure 4.2-7 shows the near-term with Phase 1/Phase 2 ADT volumes. The right half of Table 4.2-7 shows the associated street segment LOS of near-term with Phase 1/Phase 2. Also identified in Table 4.2-7 is the resulting V/C ratios for all study area street segments. As shown in the table, the following segments are calculated to operate at LOS E or F with the near-term traffic and with Phase 1/Phase 2:

- La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way (LOS E)
- Torrey Pines Road between La Jolla Village Drive and Glenbrook Way (LOS E)

As shown in Table 4.2-7, the maximum V/C increase due to Phase 1/Phase 2 along any street segment operating at LOS E would not exceed the 0.02 V/C threshold. The maximum V/C increase due to the project along any street segment operating at LOS F would not exceed the 0.01 V/C threshold. Therefore, street segment impacts would be less than significant.

**Intersections**

The right half of Table 4.2-8 shows the AM and PM peak hour intersection LOS with the Phase 1/Phase 2 traffic added to the near-term condition. As shown, all key signalized intersections are calculated to operate at LOS D or better. The critical movements at the unsignalized intersections are calculated to continue to operate at LOS B or better. Since all
intersections are calculated to continue to operate at LOS D or better with the addition of Phase 1/Phase 2 traffic under the near-term condition, impacts would be less than significant.

As discussed above, this analysis assumes that 80 percent of the project trips would walk to the site and 20 percent would drive. The Traffic Impact Analysis also includes a near-term peak-hour analysis under an “all walk” scenario. Under this scenario, some delays would decrease slightly, since less project vehicle traffic would travel through the intersection. All intersections would continue to operate at LOS D or better, and impacts would be less than significant.

**Year 2030 Impacts (Cumulative)**

Year 2030 traffic volumes were determined for conditions both with and without the project using the San Diego Association of Governments (SANDAG) Series 11 traffic forecast model. However, some volumes were increased where notably lower than existing 2010 count data. In addition, all near-term cumulative projects were included in the Year 2030 traffic volume forecast. Since the SANDAG Year 2030 model contains the existing project site land uses (residential recreation), these volumes were used in the “without project” scenario. The SANDAG Year 2030 model data was also used to estimate peak hour turning movement volumes using a template developed by LLG that estimates peak hour traffic at an intersection from future ADT volumes using the relationship between existing peak-hour turning movements and the existing ADT volumes.

The Phase 1/Phase 2 traffic was added to the Year 2030 without project traffic to obtain Year 2030 with Phase 1/Phase 2 traffic for both peak-hour turning movements and ADT volumes (i.e., the traffic forecast model conditions).

**Year 2030 without Phase 1/Phase 2**

**Street Segments**

Figure 4.2-8 shows the Year 2030 without Phase 1/Phase 2 scenario ADT volumes. Table 4.2-9 shows the street segment LOS for the Year 2030 traffic scenario. Under the Year 2030 without Phase 1/Phase 2 scenario (left half of table), the following segments are calculated to operate at LOS E or F:

- La Jolla Village Drive between Expedition Way and Torrey Pines Road (LOS E)
- La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way (LOS F)
- La Jolla Village Drive between La Jolla Scenic Way and Gilman Drive (LOS E)
- Torrey Pines Road between La Jolla Village Drive and Glenbrook Way (LOS F)
### TABLE 4.2-9
**YEAR 2030 SEGMENT OPERATIONS**

<table>
<thead>
<tr>
<th>Segment</th>
<th>Roadway Classification</th>
<th>LOS E Capacity&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Year 2030 without Phase 1/Phase 2</th>
<th>Year 2030 with Phase 1/Phase 2</th>
<th>Δ V/C&lt;sup&gt;e&lt;/sup&gt;</th>
<th>Impact Type</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>ADT&lt;sup&gt;b&lt;/sup&gt;</td>
<td>LOS&lt;sup&gt;c&lt;/sup&gt;</td>
<td>V/C&lt;sup&gt;d&lt;/sup&gt;</td>
<td>ADT</td>
</tr>
<tr>
<td>La Jolla Village Drive Expedition Way to Torrey Pines Road</td>
<td>4-Lane Major Arterial</td>
<td>40,000</td>
<td>39,100</td>
<td>E</td>
<td>0.978</td>
<td>39,115</td>
</tr>
<tr>
<td>Torrey Pines Road to La Jolla Scenic Way</td>
<td>6-Lane Major Arterial</td>
<td>45,000&lt;sup&gt;h&lt;/sup&gt;</td>
<td>54,000</td>
<td>F</td>
<td>1.200</td>
<td>54,020</td>
</tr>
<tr>
<td>La Jolla Scenic Way to La Jolla Scenic Way to Gilman Drive</td>
<td>6-Lane Prime Arterial</td>
<td>60,000</td>
<td>57,200</td>
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<tr>
<td>Torrey Pines Road La Jolla Village Drive to Glenbrook Way</td>
<td>4-Lane Collector</td>
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<td>F</td>
<td>1.027</td>
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<tr>
<td>La Jolla Scenic Way La Jolla Village Drive to La Jolla Scenic Drive North</td>
<td>2-Lane Collector</td>
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<td>D</td>
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<td>La Jolla Scenic Drive North Cliffridge Avenue to La Jolla Scenic Way</td>
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<td>1,490</td>
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</table>

<sup>a</sup>City of San Diego Roadway Capacity Standards  
<sup>b</sup>Average Daily Traffic Volumes  
<sup>c</sup>Level of Service  
<sup>d</sup>Volume to Capacity ratio  
<sup>e</sup>Increase in V/C due to project  
<sup>f</sup>La Jolla Scenic Way has a curb-to-curb width varying between 75-85 feet with a striped center median. Therefore, a capacity of 15,000 was used in the analysis.  
<sup>g</sup>Non Circulation Element Residential Collector capacity of LOS C threshold of 2,200 was utilized.  
<sup>h</sup>La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way is classified as and built to six-lane Major Arterial standards, with the exception of a raised center median. Therefore, the average capacity between a four-lane and six-lane Major Arterial was used.

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**Intersections**

Table 4.2-10 shows the intersection LOS for the Year 2030 traffic scenario. The left half of Table 4.2-10 shows the AM and PM peak-hour intersection LOS for the Year 2030 without project condition. As shown, all key signalized intersections are calculated to operate at LOS D or better. The critical movements at the unsignalized intersections are calculated to continue to operate at LOS C or better.
### Year 2030 with Phase 1/Phase 2

#### Street Segments

Figure 4.2-9 shows Year 2030 with Phase 1/Phase 2 ADT volumes. The right half of Table 4.2-9 shows the associated street segment LOS under this Year 2030 with Phase 1/Phase 2. As shown in the table, the following segments are calculated to operate at LOS E or F in Year 2030 with Phase 1/Phase 2:

- La Jolla Village Drive between Expedition Way and Torrey Pines Road (LOS E)
- La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way (LOS F)
- La Jolla Village Drive between La Jolla Scenic Way and Gilman Drive (LOS E)
- Torrey Pines Road between La Jolla Village Drive and Glenbrook Way (LOS F)

Also identified in Table 4.2-9 are the resulting V/C ratios for all study area street segments. As shown, the maximum V/C increase due to Phase 1/Phase 2 along any street segment operating at LOS E would not exceed the 0.02 V/C threshold and the maximum V/C increase due to Phase 1/Phase 2 along any street segment operating at LOS F would not exceed the 0.01 threshold. Therefore, street segment impacts would be less than significant.

#### Intersections

The right half of Table 4.2-10 shows the AM and PM peak-hour intersection LOS with Phase 1/Phase 2 traffic added to the future Year 2030 conditions. As shown, all key signalized intersections are calculated to operate at LOS D or better. The critical movements at the
unsignalized intersections are calculated to continue to operate at LOS C or better. Since all intersections are calculated to continue to operate at LOS D or better with the addition of Phase 1/Phase 2 traffic, impacts would be less than significant.

**Construction Traffic**

**Grading Period**

Construction would commence upon project approval. Grading activities would be expected to last for a period of 5 days and would generate 3,600 cubic yards (cy) of debris. Based on information provided by the applicant, trucks hauling export materials can carry up to 20 cy per truck. Assuming 3,600 cy are exported from the site with 20 cy per truck over the course of 5 days, approximately 36 inbound trucks would access the site per day during the grading period generating 72 daily truck trips (108 ADT using a Passenger Car Equivalent of 1.5 per truck trip). Construction activities are limited to eight-hour days between the hours of 8:30 a.m. and 3:30 p.m. due to the fact that the City does not typically allow traffic control outside of these hours. However, specific construction activities may occasionally necessitate truck deliveries before 8:30 a.m. Therefore, limited construction traffic could occur during the 7:00–9:00 a.m. peak hour, but not during the 4:00–6:00 p.m. peak hour.

Assuming the eight hours of grading activities, each hour represents 12.5 percent of the daily operations. A total of 13 inbound peak hour grading truck trips would be generated during the 8:30–9:00 a.m. peak hour. Allowing for sufficient time to fill a 20-cy-capacity truck, no outbound trips would be expected during this half-hour window.

**Construction Period**

The number of construction workers expected to be on-site during the 12- to 18-month proposed Phase 1/Phase 2 construction period would range between 5 and 20 workers per day. Assuming each worker drives alone, arrives to the site in the morning, and departs the site at the end of the work day, two trips per worker would be generated. Two trips per worker for 20 workers would generate 40 daily trips. Assuming all workers arrive prior to the 8:30 a.m. construction start time within the 7:00–9:00 a.m. peak period, 20 inbound AM peak hour trips would be generated. No PM peak hour trips would occur during the commuter peak period from 4:00-6:00 p.m., since construction-related activities would end by 3:30 p.m.

It should be noted that due to parking restrictions in the area, construction workers would not drive alone to the site. As detailed in Chapter 3, Project Description, an off-site location would be identified for construction workers to park so they can be shuttled to the work site. Assuming each shuttle can carry 10 workers, this could reduce the total number of trips within the immediate area of the project site to two AM peak hour trips and four ADT.
Total Construction Trip Generation

The maximum number of trips generated by construction-related activities is 148 ADT, with 33 AM peak hour trips, and would only occur during the short five-day grading period. After the five-day grading period, a maximum of 40 ADT and 20 AM peak hour trips would be generated for the remaining 12- to 18-month construction period, not assuming any reductions for off-site shuttling.

Estimating the amount, distribution, and duration of construction traffic is difficult. The origin of truck trips and construction workers cannot be forecast with accuracy as it would depend largely on the contractor and the sources from which construction material would be delivered and the location to receive the exported material.

Although it is anticipated that shuttle service would transport workers to/from the site from an off-site location, for purposes of being conservative, it was estimated that the majority of construction traffic (90 percent or 133 ADT/30 AM peak hour trips) could be expected to be oriented to/from the east on La Jolla Village Drive (connecting to I-5). A small amount of traffic (10 percent, or 15 ADT/3 AM peak hour trips) could be anticipated to travel to the west to/from North Torrey Pines Road.

All study area intersections are calculated to currently operate at LOS C or better during the AM and PM peak hours. With the addition of this traffic added to the street system (33 inbound AM peak hour trips or 15 inbound AM trips with shuttle reductions), no changes in LOS would be expected, nor would any substantial changes in peak-hour intersection delay be expected.

The majority of the 148 ADT (90 percent or 133 ADT or 112 with shuttle reductions) would be added to the LOS C operating segment of La Jolla Village Drive between Gilman Drive and La Jolla Scenic Way. Also, no degradations in LOS would be expected along the LOS D portion of La Jolla Scenic Way with the addition of 148 ADT.

It should also be noted that construction traffic is temporary in nature. The maximum of 148 ADT would only be on the street system for a period of five days. The remaining 12- to 18-month construction period would generate at most 40 ADT, which is less than the total daily trips generated by the Phase 1/Phase 2 project.

As detailed in Chapter 3, Project Description, a traffic control plan would be prepared and approved by the City traffic engineering department prior to construction activities. In addition, construction hours would be from 8:30 a.m.–3:30 p.m. (allowing limited deliveries prior to 8:30 a.m.), and construction workers would park off-site and be shuttled to the construction work site.

With the implementation of these features as part of the proposed Phase 1/Phase 2 project, it can therefore be concluded that no significant construction-related impacts would be expected to occur during the temporary construction period.
b. Existing with Improvements Option

In order to develop the baseline condition for the Existing with Improvements option, the existing traffic volumes were adjusted to account for the current use of the Cliffridge property operating as the Hillel facility. The existing traffic counts used in this report were collected while the Cliffridge property functioned as a Hillel center. Therefore, the existing baseline scenario would need to reflect the traffic volumes that would be generated by a single-family residence. Given the Cliffridge property would be approximately 25 percent of the gross square footage of the Phase 1/Phase 2 project, 75 percent of the project-generated traffic was deducted from the existing traffic volumes.

In order to estimate the traffic that would be generated from the current zoning of the Cliffridge property, the City trip rate for a “single-family detached” home was calculated. The Cliffridge property would be expected to generate nine ADT with one A.M. peak hour trip (0 inbound/1 outbound) and one P.M. peak hour trip (1 inbound/0 outbound).

From there, the trips generated by the use of the Cliffridge property at its current zoning as a single-family residence was added to arrive at the Existing with Current Zoning condition (baseline condition). Finally, the current Hillel facility traffic volumes (estimated as 25 percent of the Phase 1/Phase 2 project) were added to the existing baseline condition to arrive at Existing with Improvements traffic volumes.

Tables 4.2-11 and 4.2-12 show the Existing with Improvements intersection and segment operations compared to the baseline condition, respectively. The analysis results for the Existing with Improvements scenario are virtually the same, if not better, as compared to the existing conditions previously detailed in Section 4.2.1.1.

Since there are virtually no changes in the delay and V/C ratio between with the current zoning and with improvements analyses under existing conditions, the same results would be expected under both the near-term and Year 2030 cumulative conditions. It can therefore be concluded that no significant direct or cumulative impacts would be expected with the Existing with Improvements option.

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<tr>
<th>Intersection</th>
<th>Control Type</th>
<th>Peak Hour</th>
<th>Existing With Current Zoning</th>
<th>Existing With Improvements</th>
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<td>Delay</td>
<td>LOS</td>
</tr>
<tr>
<td>1. La Jolla Village Drive/ Torrey Pines Road</td>
<td>Signal</td>
<td>AM</td>
<td>21.6</td>
<td>C</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>33.1</td>
<td>C</td>
</tr>
<tr>
<td>2. La Jolla Village Drive/ La Jolla Scenic Way</td>
<td>Signal</td>
<td>AM</td>
<td>15.2</td>
<td>B</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>20.8</td>
<td>C</td>
</tr>
<tr>
<td>3. La Jolla Scenic Drive North/Cliffridge Way</td>
<td>OWSC c</td>
<td>AM</td>
<td>8.6</td>
<td>A</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PM</td>
<td>8.6</td>
<td>A</td>
</tr>
<tr>
<td>4. La Jolla Scenic Way/ La</td>
<td>OWSC</td>
<td>AM</td>
<td>14.1</td>
<td>A</td>
</tr>
</tbody>
</table>
4.0 Environmental Analysis  

4.2 Transportation/Circulation/Parking

<table>
<thead>
<tr>
<th>Jolla Scenic Drive North</th>
<th>PM</th>
<th>12.2</th>
<th>B</th>
<th>12.3</th>
<th>B</th>
</tr>
</thead>
<tbody>
<tr>
<td>La Jolla Scenic Drive</td>
<td>AM</td>
<td>13.7</td>
<td>B</td>
<td>13.7</td>
<td>B</td>
</tr>
<tr>
<td>North/ Caminito Desoe</td>
<td>PM</td>
<td>12.6</td>
<td>B</td>
<td>12.7</td>
<td>B</td>
</tr>
</tbody>
</table>

*aAverage delay expressed in seconds per vehicle
*bLevel of Service
*cIncrease in delay due to project
*dOWSC — One-Way Stop Controlled intersection. Minor street delay reported.
*eThis intersection is currently uncontrolled. However, Caminito Desoe was analyzed as the minor street stop-controlled movement since vehicles utilizing this movement were observed to stop.

Likewise, construction activities associated with the Existing with Improvements option would be minor, including the construction of the parking area and curb cut. These improvements would take approximately three to six months, and would require no more than five workers per day. In accordance with City regulations and permit conditions, workers would need to park at an off-site location and be shuttled into the site. Work would typically be limited to between the hours of 8:30 A.M. and 3:30 P.M. Overall, traffic impacts associated with the Existing with Improvements option would be less than significant.

4.2.3.2 Significance of Impacts

a. Phase 1/Phase 2

Existing Plus Project Impacts

The V/C increase at La Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way, and at Torrey Pines Road between La Jolla Village Drive and Glenbrook Way, would not exceed 0.02. Therefore, impacts would be less than significant. Additionally, all intersections are calculated to continue to operate at an acceptable LOS C or better with the addition of the Phase 1/Phase 2; thus, impacts would be less than significant.

Near-term Impacts

Since Phase 1/Phase 2’s contribution to affected street segments would fall below the significance thresholds and all intersections would continue to operate at LOS D or better, near-term impacts to street segments and intersections within the study area would be less than significant.

Year 2030 Impacts

Phase 1/Phase 2’s contribution to street segments in the year 2030 condition would fall below the applicable significance threshold. In addition, Phase 1/Phase 2 would not increase the delay at intersections in the study area. Therefore, Phase 1/Phase 2’s contribution to street segments and intersections would not be cumulatively considerable.
**Construction Traffic**

With the addition of construction traffic added to the street system, no changes in LOS would be expected, nor would any substantial changes in intersection delay or increases in street segment V/C ratios be expected. It should also be noted that construction traffic is temporary in nature, and the City requires traffic controls during construction periods as well as restricting construction period to avoid peak hour traffic timeframes. It can therefore be concluded that no significant construction-related impacts would be expected to occur during the temporary construction period.

**b. Existing with Improvements Option**

There are virtually no changes in the delay and V/C ratio when comparing the Existing with Improvements option to the baseline condition under existing conditions, and the same would be expected under the near-term cumulative conditions. It can therefore be concluded that no significant direct or cumulative traffic impacts would be expected under the operational or construction phases of the Existing with Improvements option.

### 4.2.3.3 Mitigation, Monitoring, and Reporting

**a. Phase 1/Phase 2**

No mitigation is required.

**b. Existing with Improvements Option**

No mitigation is required.

### 4.2.4 Issue 2: Parking

Would the project result in an increased demand for off-site parking or substantially affect the availability of existing parking in an adjacent residential area, including the availability of public parking?

### 4.2.4.1 Impacts

**a. Phase 1/Phase 2**

**Parking Demand**

As described above, it is expected that a typical program would draw between 10 and 30 students and, at most, 50 patrons to the site. It is also expected that seven staff members would serve the facility. There are 27 parking spaces proposed as a part of Phase 2.
As previously discussed, a monthly program guide was provided by the applicant indicating the
dates and times of the events to be held at the proposed facility (see EIR Section 3.4.2.1(a)). It
is expected, with limited exception, that programs to be held at the site will have between
10 and 50 attendees; however, a conservative approach to the parking demand analyses is
based on a total of up to 100 visitors to the facility during peak hours. It is also expected that
Hillel would employ 7 full-time staff members.

Currently, no specific parking minimum or maximum requirements exist for this type of facility in
the City’s Municipal Code (see Chapter 14, Article 2, Division 5). Although the Phase 1/Phase 2
project would be used for religious purposes, it is not a church or place of religious assembly as
defined in the Municipal Code (i.e., there are no pews or permanent seats for services; see
such circumstances, the City and industry standard is to estimate parking demand based on
information for existing comparable facilities. Therefore, data for existing Hillel facilities
throughout California were used to estimate the parking supply needed to adequately serve the
patrons and staff of the facility. Consideration was given to the types of events/programs to be
held at the facility, the amount of people expected to attend these events, the staff needed to
serve the facility, survey data of existing UCSD Hillel student members, and survey and
statistical data gathered from other similar Hillel facilities in California.

**UCSD Hillel Student Center: Event Attendance Transportation Modes**

A survey was conducted in March 2010 among the students who currently attend Hillel-related
activities at the UCSD campus. The UCSD survey collected responses from 115 students. The
results of this survey found that approximately 80 percent of the students stated in their
response that they would walk to the Hillel facility at its proposed location. Of the students who
said they would drive, just over 50 percent of these respondents suggested they would carpool.
Using the results of this survey, if 100 students were to visit the proposed facility, only 20
percent would arrive by car (20 arrive by car). Of these 20 people, half (10 people) would arrive
in a two-person carpool (5 cars) and the other half would drive alone (10 cars). Under these
assumptions, 15 parking spaces would be needed. Assuming all seven staff on are on-site at
one time and each drove individually, an additional seven spaces would be required for a total
of 22 spaces. The project proposes 27 spaces.

The UCSD survey of existing Hillel members found that approximately 80 percent of the
students stated in their response that they would walk to the Hillel facility at its proposed
location. Using the results of this survey, if 50 students were to attend a typical event,
20 percent would drive (10 students, 20 trips). Of the 20 percent of students who would drive, or
10 potential vehicle trips, half would carpool (five total vehicles). Therefore, five parking spaces
would be needed to serve the students and up to seven would be needed to serve the staff, for
a total of 12 parking spaces. In conducting the A.M. and P.M. peak hour intersection and daily
street segment analyses, a maximum of 100 students was assumed to frequent the site during
the peak four-hour period of the day. If the same transportation mode split percentages are
applied to 100 students, only 10 spaces would be necessary to accommodate student patrons.
(assuming all 100 students are on-site at one time). An additional seven spaces for staff would necessitate 17 spaces, well below the 27 spaces proposed as part of the project.

**Comparable Hillel Facilities**

A list of other existing comparable Hillel facilities within southern California was developed to aid in estimating the subject facility’s parking demand. The following facilities were selected for further data collection: Hillel at UCLA, Santa Barbara Hillel at UCSB, and the CSU Northridge Hillel.

**The UCLA Hillel Student Center:** This facility most closely represents the proposed UCSD facility in terms of its approximate location to the university, surrounding land uses and in the activities planned. However, the UCLA facility is much larger at approximately 25,000 square feet. The UCLA survey indicated that on average, about 33 students occupied the center at one time. Of those students, 94 percent walked to the existing facility while 6 percent drove. The 13 parking spaces provided at the UCLA facility are primarily reserved for staff members. Based on discussions with the Director of the Hillel at this location, no community complaints have been filed and the parking supply is adequate almost every day with very limited exceptions. Because the majority of students walk, and the remainder carpool, the facility has an adequate parking supply. Appendix G of the TIA contains the transportation mode survey data collected for UCLA.

**The UCSB Hillel Student Center:** This facility is approximately 10,000 square feet and is located just off-campus in the Isla Vista community, which is predominately a student housing area. The results of the UCSB survey show that on average, about 34 students occupy the center at one time. Of those 34 students, 84 percent walked while 16 percent drove (approximately six cars). UCSB has six staff members. The UCSB Hillel currently provides 28 parking spaces open to staff, visitors, and students. Assuming all six staff members are parked on-site at the same time as the six estimated student drivers, adequate parking exists at the facility. Appendix F of the TIA contains the UCSB Hillel facility survey data.

**The CSUN Hillel Student Center:** This facility is approximately 5,000 square feet and is located just off-campus within an established residential neighborhood, yet still within walking distance to the university. The program log for this center is similar to that of the project. Survey data was not collected at this facility. The CSUN campus is more of a commuter campus, which would suggest more students would be likely to drive to the site. However, even though this location provides 40 parking spaces, parking remains a non-issue for this site. The facility reserves 23 of the 40 spaces to be sold to students on a permitted basis by semester or for the entire academic year. It can therefore be concluded that a parking supply of 17 spaces for Hillel patrons adequately accommodates the facility, since the excess amount of supply is offered to non-Hillel related parking demand. The CSUN Hillel Student Center also provides adequate parking with 40 parking spaces, some of which are sold to students on a permitted basis.
Additional Parking Supply Data: In addition to these site-specific surveys, information was collected from Hillel student centers across the country. The key characteristics identified are: (1) campus; (2) location; (3) surrounding uses; (4) square footage; and (5) number of parking spaces provided. By dividing the number of parking spaces by the square footage, a parking rate was calculated. As shown in Table 15-1 of TIA, the average parking rate for California Hillel student centers is 1.9 spaces per 1,000 square feet, and the average parking rate for all centers across the country is 1.2 spaces per 1,000 square feet. The parking rate for the proposed facility is 3.7 spaces per 1,000 square feet, comparably higher than the average. Comparable average rates are lower than that for the project. Based on information provided for similar Hillel facilities at California universities and based on average parking rates for Hillel student centers across the country, it can be reasonably estimated that the 27 parking spaces proposed for the project would be adequate to serve Phase 1/Phase 2, and impacts to parking would be less than significant.

Special Events Parking Demand

On limited occasions (see Section 3.4.2.1(a)) attendance at HCJL events could exceed the daily maximum of 100 visitors triggering the project’s Transportation Demand and Parking Management Plan (Appendix B-2; see Section 4.2.4.1). It is anticipated that up to eight times per year, occasional special event occupancy could be between 100 to 150 attendees, and up to four times per year occupancy could be greater than 150. At no time would occupancy of the facility be allowed to exceed its maximum under the applicable code.

On-street Parking Supply

On-street parking is currently provided on the west side of La Jolla Scenic Way. Approximately 25 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection and 75 feet north of the La Jolla Scenic Way/La Jolla Scenic Drive North intersection, no street parking is permitted. The segment of La Jolla Scenic Way between La Jolla Village Drive and La Jolla Scenic Drive North is approximately 230 feet in length. Thus, 130 feet is currently available for on-street parking (about six to seven vehicles). It should be noted that field observations showed seven vehicles parked along this 130-foot section. Therefore, with the construction of the project driveway, approximately two to three on-street parking spaces would be lost (25-foot driveway, plus 25 feet of red curb north of the proposed driveway, would total 50 feet).

A street vacation of the existing La Jolla Scenic Drive cul-de-sac is proposed in order to provide 10,000 square feet of open space on the project site. With the proposed cul-de-sac vacation, a change in the supply of on-street parking would result. Currently, red curb is painted for the entirety of the cul-de-sac for a linear distance of approximately 130 feet. With the street vacation, approximately seven on-street parking spaces would be lost to accommodate the relocation driveway for the Cliffridge house, a pedestrian ramp connecting to the enhanced sidewalk, and a relocated fire hydrant. However, one space would remain and be relocated along the new cul-de-sac, for a net loss of six spaces with the street vacation.
Figure 4.2-10 shows the location of the street vacation and the changes in on-street parking. In addition to the proposed street vacation, the Phase 1/Phase 2 project proposes to narrow La Jolla Scenic Drive North by two feet to provide for a 12-foot parkway on the north side of the roadway with increased landscaping. La Jolla Scenic Drive North currently measures 36 feet wide from curb to curb. The roadway serves two-way traffic with one lane in each direction, and provides curbside parking on both sides of the street. It is classified as a Local Street in the La Jolla Community Plan. According to the City of San Diego Street Design Manual, Local Streets (residential streets) are required to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards.

As discussed in Chapter 3, the Phase 1/Phase 2 project proposes an enhanced pedestrian environment and bicycle parking facilities to encourage alternate modes of transportation. Given the provision of ample bicycle parking and the siting of the facility proximate to the campus, sidewalks, and walking paths, impacts from the loss of parking spaces would be less than significant.

b. Existing with Improvements Option

The Existing with Improvements option would provide six standard parking spaces (one as handicap accessible) in a new surface parking lot with a new driveway connecting to the existing cul-de-sac. As previously detailed, the offices would be used for primarily religious purposes. Per the City’s Municipal Code (Section 142.0530, Table 142-05F), for professional office uses, 3.3 parking spaces are required per 1,000 square feet of gross floor area. The existing Cliffridge property is 1,792 square feet; thus, six parking spaces would be required. A new pedestrian curb ramp on Cliffridge Avenue would also be constructed, which would provide access to the existing walkway at the front (east) of the Cliffridge property. The Existing with Improvements option would provide adequate parking for the proposed use. Impacts would be less than significant.

4.2.4.2 Significance of Impacts

a. Phase 1/Phase 2

Based on the calculated parking need, Phase 1/Phase 2 would provide adequate parking for the facility. Therefore, impacts to parking would be less than significant.

b. Existing with Improvements Option

There would be no increase in the number of staff or activities at this location. Thus, no increase in parking would be required, and impacts related to parking would be less than significant.
4.2.4.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.

4.2.5 Issue 3: Traffic Hazards

Would the project result in an increase in traffic hazards for motor vehicles, bicycles, or pedestrians due to non-standard design features?

4.2.5.1 Impacts

a. Phase 1/Phase 2

During Phase 1, a temporary sidewalk connecting La Jolla Village Drive to La Jolla Scenic Drive North would be constructed. In addition, a new pedestrian curb ramp would be constructed on Cliffridge Avenue. These improvements would ensure that traffic hazard impacts would be less than significant.

Vehicular access to the site for Phase 2 is proposed via one right-turn-in/right-turn-out only driveway located on La Jolla Scenic Way. Locating the driveway on La Jolla Scenic Way (as opposed to La Jolla Scenic Drive North) would prevent conflicts with driveways serving residences located on La Jolla Scenic Drive North. An analysis of the proposed driveway location was completed to assure that adequate sight distance would be provided. The design speed on La Jolla Scenic Way is 30 mph. According to the Caltrans Highway Design Manual, driveways on roadways with a speed limit of 30 mph require 200 feet of stopping sight distance.

Adequate sight distance is observed at the project driveway. The driveway would be located approximately 150 feet south of the signalized La Jolla Village Drive/La Jolla Scenic Way intersection, which is visible from the proposed driveway location. Vehicles exiting the property would be restricted to a right-turn movement by the existing raised median, thus requiring them to look in the northbound direction for a gap in traffic. In addition, based on field observations, sufficient gap time would exist for patrons exiting the site associated with Phase 2, since they would be able to make their eastbound right-turn concurrent with the northbound movement at the signalized intersection of La Jolla Village Drive and La Jolla Scenic Way (no southbound traffic would be utilizing La Jolla Scenic Way during this phase other than eastbound to southbound right-turn-on-red movements and northbound to southbound U-turn movements). Approximately 25 feet of curb would be painted red just north of the proposed driveway on La Jolla Scenic Way to ensure adequate sight distance is provided.
Outbound traffic oriented to La Jolla Village Drive would make a southbound to northbound U-turn at the intersection of La Jolla Scenic Drive North and Caminito Deseo. A field observation of the available turning radius at Caminito Deseo was compared to the required minimum design internal turning radius of 36 feet. Based on the field visit under existing roadway conditions, it was observed that 40 feet of internal turning radius is available. Therefore, a U-turn is feasible at this intersection. Although a U-turn is feasible, additional traffic measures would be required to prevent potential conflict between U-turning vehicles and vehicles making a westbound to northbound right turn from Caminito Deseo onto La Jolla Scenic Drive.

Currently, vehicles may use the La Jolla Scenic Drive North cul-de-sac as a turnaround area. As shown on Figure 4.2-2, the traffic study revealed that few vehicles turn into the cul-de-sac. During the AM peak hours, no vehicles turned into the cul-de-sac from La Jolla Scenic Drive North, and only two vehicles turned into the cul-de-sac from Cliffridge Avenue. Only seven vehicles turned into the cul-de-sac during PM peak hours. Phase 1/Phase 2 would abandon the westerly cul-de-sac portion of La Jolla Scenic Drive North and reconfigure the street as a curve into Cliffridge Drive. However, the vacation of the street right-of-way and street reconfiguration combined with additional sidewalks in this area would actually improve pedestrian and bicycle routes and would not pose a hazard to vehicles.

In addition to the proposed street vacation, Phase 1/Phase 2 proposes to narrow La Jolla Scenic Drive North by two feet to provide for a 12-foot parkway on the north side of the roadway with increased landscaping. La Jolla Scenic Drive North currently measures 36 feet wide from curb to curb. The roadway serves two-way traffic with one lane in each direction, and provides curbside parking on both sides of the street. It is classified as a Local Street in the La Jolla Community Plan. According to the City’s Street Design Manual, Local Streets (residential streets) are required to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking). La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards.

Pedestrian access to Phase 1/Phase 2 is planned via a non-contiguous sidewalk encompassing the facility with the primary walkway into the facility being located off La Jolla Village Drive. This location was chosen to provide a safer route into the center than through the driveway where cars will be maneuvering in and out, and since the crosswalks from the UCSD campus along La Jolla Village Drive are located on both ends of the walkway.

These design features would ensure that traffic hazards to motor vehicles, bicycles, and pedestrians would be less than significant.

**b. Existing with Improvements Option**

The new pedestrian curb ramp would be constructed on Cliffridge Avenue towards the front of the Cliffridge property. This improvement would ensure that traffic hazards to motor vehicles, pedestrians, and bicycles would be less than significant.
4.2.5.2 Significance of Impacts

a. Phase 1/Phase 2

Due to the design of the Phase 1/Phase 2 access, impacts related to traffic hazards for motor vehicles, bicyclists, or pedestrians would be less than significant.

b. Existing with Improvements Option

The improvement detailed above would ensure that traffic hazards to motor vehicles, pedestrians, and bicycles would be less than significant.

4.2.5.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.
FIGURE 4.2-1
Existing Conditions
FIGURE 4.2-2
Existing Average Daily Traffic and Peak Hour Volumes

NOTES:
- ADT (Average Daily Traffic) shown midblock
- AM/PM peak hour volumes are shown at the intersections
- Count Data Collected February 2010
FIGURE 4.2-3
Vehicular Traffic Distribution for Phase 1/Phase 2
NOTES:
- ADT (Average Daily Traffic) shown midblock
- AM/PM peak hour volumes are shown at the intersections

FIGURE 4.2-4
Phase 1/Phase 2 Traffic Volumes
FIGURE 4.2-5
Existing Plus Phase 1/Phase 2 Traffic Volumes

Map Source: Linscott, Law, and Greenspan, January 2012

NOTES:
- ADT (Average Daily Traffic) shown midblock
- AM/PM peak hour volumes are shown at the intersections
FIGURE 4.2-6
Near-term Traffic Volumes without Phase 1/Phase 2

NOTES:
- ADT (Average Daily Traffic) shown midblock
- AM/PM peak hour volumes are shown at the intersections

Map Source: Linscott, Law, and Greenspan, May 2013
FIGURE 4.2-7
Near-term Traffic Volumes with Phase 1/Phase 2

NOTES:
- ADT (Average Daily Traffic) shown midblock
- AM/PM peak hour volumes are shown at the intersections

Map Source: Linscott, Law, and Greenspan, May 2013
NOTES:
- ADT (Average Daily Traffic) shown midblock
- AM/PM peak hour volumes are shown at the intersections

Map Source: Linscott, Law, and Greenspan, May 2013

FIGURE 4.2-8
Year 2030 without Phase 1/Phase 2 Traffic Volumes
NOTES:
- ADT (Average Daily Traffic) shown midblock
- AM/PM peak hour volumes are shown at the intersections

FIGURE 4.2-9
Year 2030 with Phase 1/Phase 2 Traffic Volumes
Phase 1/Phase 2 ROW Vacation: Changes in On-street Parking

FIGURE 4.2-10

Map Source: Linscott, Law, and Greenspan, May 2013

M:\JOBS\i4609\env\graphics\traffic\fig4.2-10.ai  06/05/13
4.3 Biological Resources

RECON biologists performed a general biological survey of the project site to identify the potential for sensitive plant communities, wildlife, or plant species to occur on the site and its immediate vicinity. The findings of the biological survey are summarized below, and the technical report is included as Appendix C-1 of this EIR.

4.3.1 Existing Conditions

RECON biologists conducted a general biological survey site visit for the vacant portion of the project site in May 2013 to update fieldwork conducted in 2010, 2007, and 2003. An additional site visit occurred on July 26, 2016 to verify the conditions of the biological report. The vegetation communities and land cover types, disturbed and developed, on-site had not changed since the 2013 survey (Appendix C-2). The following is a summary of the existing conditions.

4.3.1.1 Vegetation Communities/Land Cover Types

Two land cover types occur on the project site: disturbed land and developed land, as described below.

a. Disturbed Land (1.28 acres)

Disturbed land contains compacted soils and is dominated by ruderal and ornamental plant species. The site has been graded in the past, possibly when the surrounding area was developed. Areas within the project site classified as disturbed land support non-native species. On-site plant species are detailed below in Section 4.3.1.2.

b. Developed Land (0.11 acre)

Developed lands include areas that have been permanently altered for human use, such as roads. A portion of La Jolla Scenic North Drive is within the western corner of the site and the sidewalk along the northern perimeter is classified as developed lands.

4.3.1.2 Plants

Nineteen plant species were observed on-site during the survey. Of the 19 plant species observed, two are native and the remainder are introduced or non-native. Table 4.3-1 provides a complete list of plant species observed during the survey. All the plant species were observed in areas of disturbed habitat.
### TABLE 4.3-1

**PLANT SPECIES OBSERVED**

<table>
<thead>
<tr>
<th>Scientific Name</th>
<th>Common Name</th>
<th>Origin</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amsinckia menziesii</td>
<td>rancher’s fireweed</td>
<td>N</td>
</tr>
<tr>
<td>Atriplex semibaccata</td>
<td>Australian saltbush</td>
<td>I</td>
</tr>
<tr>
<td>Avena fatua</td>
<td>wild oat</td>
<td>I</td>
</tr>
<tr>
<td>Brassica nigra</td>
<td>black mustard</td>
<td>I</td>
</tr>
<tr>
<td>Bromus diandrus</td>
<td>ripgut grass</td>
<td>I</td>
</tr>
<tr>
<td>Bromus hordeaceus</td>
<td>smooth brome</td>
<td>I</td>
</tr>
<tr>
<td>Carpobrotus chilensis</td>
<td>sea fig</td>
<td>I</td>
</tr>
<tr>
<td>Chamaerops humilis</td>
<td>Mediterranean fan palm</td>
<td>I</td>
</tr>
<tr>
<td>Chenopodium sp.</td>
<td>goosefoot</td>
<td>I</td>
</tr>
<tr>
<td>Conyza canadensis</td>
<td>horseweed</td>
<td>I</td>
</tr>
<tr>
<td>Cynodon dactylon</td>
<td>Bermuda grass</td>
<td>I</td>
</tr>
<tr>
<td>Erodium moschatum</td>
<td>green-stemmed filaree</td>
<td>I</td>
</tr>
<tr>
<td>Eucalyptus spp.</td>
<td>eucalyptus</td>
<td>I</td>
</tr>
<tr>
<td>Isocoma menziesii</td>
<td>coast goldenbush</td>
<td>N</td>
</tr>
<tr>
<td>Isocoma menziesii var. decumbens</td>
<td>decumbent goldenbush</td>
<td>N</td>
</tr>
<tr>
<td>Malva parviflora</td>
<td>cheeseweed, little mallow</td>
<td>I</td>
</tr>
<tr>
<td>Melilotus indica</td>
<td>sourclover</td>
<td>I</td>
</tr>
<tr>
<td>Mesembryanthemum crystallinum</td>
<td>crystalline ice plant</td>
<td>I</td>
</tr>
<tr>
<td>Lamarckia aurea</td>
<td>goldentop</td>
<td>I</td>
</tr>
<tr>
<td>Pinus sp.</td>
<td>pine</td>
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<tr>
<td>Salsola tragus</td>
<td>Russian thistle, tumbleweed</td>
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</tr>
<tr>
<td>Sonchus oleraceus</td>
<td>common sow thistle</td>
<td>I</td>
</tr>
<tr>
<td>Taraxacum officinale</td>
<td>dandelion</td>
<td>I</td>
</tr>
<tr>
<td>Vulpia myuros var. myuros</td>
<td>rattail fescue</td>
<td>I</td>
</tr>
</tbody>
</table>

N = Native, I = Introduced species from outside locality

#### 4.3.1.3 Wildlife

Wildlife species observed are typical of disturbed and urban settings. The developed area provides minimal foraging and sheltering opportunities for birds. Bird species detected on-site were hooded oriole (*Icterus cucullatus nelson*), black phoebe (*Sayornis nigricans semiatra*), lesser goldfinch (*Carduelis psaltria hesperophilus*), California towhee (*Pipilo crissalis*), house finch (*Carpodacus mexicanus frontalis*), Anna’s hummingbird (*Calypte anna*), northern mockingbird (*Mimus polyglotitos polyglottos*), and yellow-rumped warbler (*Dendroica coronata*). All of these species have adapted to residential and developed areas.

Developed areas provide low habitat value for wildlife. No mammals were observed on-site. The trees on-site were inspected for signs of roosting bats, but none were detected. Reptiles may use the developed area for basking. However, no amphibians or reptiles were detected during field surveys.
4.3.1.4 Sensitive Species

Sensitive species include those that are: (1) covered species or narrow endemic species under the City MSCP; (2) listed by state or federal agencies as threatened or endangered or are proposed for listing; (3) on List 1B (considered endangered throughout its range) or List 2 (considered endangered in California but more common elsewhere) of the CNPS *Inventory of Rare and Endangered Vascular Plants of California* (2001); (4) considered rare, endangered, or threatened by the California Natural Diversity Data Base (CNDDDB) (State of California 2010e), the City’s biology guidelines (2002), or local conservation organizations or specialists. Noteworthy plant species are considered to be those that are on List 3 (more information about the plant’s distribution and rarity needed) and List 4 (plants of limited distribution) of the California Native Plant Society (CNPS) *Inventory*. Sensitive vegetation communities are those identified by the CNDDDB (Holland 1986) or identified by the City (2002).

Assessments for the potential occurrence of sensitive, or federally or state listed species, are based upon known ranges, habitat preferences for the species, species occurrence records from the CNDDDB (State of California 2010e), and species occurrence records from other sites in the vicinity of the site. Biological resource sensitivity determinations follow the guidelines presented in the Significance Determination Guidelines under CEQA (City of San Diego 2011).

a. Sensitive Vegetation Communities

No sensitive vegetation communities exist on-site. Disturbed (Tier IV habitat) and developed lands (no Tier) are not considered sensitive under the City of San Diego’s Biological Resources Guidelines (City of San Diego 2002).

b. Sensitive Plants

Decumbent goldenbush is a CNPS-ranked species (List 1B) that was observed on-site. No other sensitive plant species, narrow endemic plant species, or vegetation communities were located within the site during the biological survey or are expected to occur on-site. The site is dominated by ruderal and ornamental plant species, and contains compacted soils. Other species that are known to occur in the project vicinity (within 2 miles of the project site) which are federally listed threatened or endangered are not expected to occur due to the lack of suitable habitat.

c. Sensitive Wildlife

No sensitive wildlife species were detected on-site during the survey; however, the project site contains trees that may support nesting raptors. In addition, there are eucalyptus trees approximately 80 feet east of the property boundary. All sensitive wildlife species known to occur in the project vicinity (within 2 miles of the survey area) that are federally listed threatened or endangered are not expected to occur due to the lack of suitable habitat.
Cooper’s hawk, a sensitive raptor species recognized by CDFW, and migratory and breeding birds have potential to nest on and adjacent to the project site.

### 4.3.1.5 Regulatory Framework

The following expands on the introduction for the MSCP and MHPA provided in the Planning Context of the Environmental Setting, Section 2.5 of this EIR.

#### a. Natural Community Conservation Planning

The NCCP Program was enacted by the State of California in 1991 to provide long-term regional protection of natural vegetation and wildlife diversity while allowing compatible development. The NCCP process was initiated to provide an alternative to single-species conservation efforts (habitat conservation plans). The NCCP is intended to provide a regional approach to the protection of species within a designated natural community. In the City, the MSCP is an outgrowth of this planning.

#### b. Multiple Species Conservation Program

The MSCP is a comprehensive, long-term habitat conservation planning program that covers approximately 900 square miles in southwestern San Diego County under the federal and state Endangered Species Acts and state NCCP Act of 1991. Local jurisdictions, including the City, implement their portions of the regional umbrella MSCP through Subarea plans, which describe specific implementing mechanisms. The City’s MSCP Subarea Plan was approved in March 1997. The City’s MSCP study area includes 206,124 acres within its municipal boundaries. The City’s planned MSCP preserve totals 56,831 acres, with 52,012 acres (90 percent) targeted for preservation. In 2004, the City committed to increasing the conservation target by 715 acres in association with revisions to the City’s brush management regulations in response to local fires.

In July 1997, the City signed an Implementing Agreement with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG). The Implementing Agreement serves as a binding contract between the City, the USFWS, and the CDFG that identifies the roles and responsibilities of the parties to implement the MSCP and Subarea Plan. The agreement allows the City to issue incidental take authorizations for “MSCP Covered” species.

“MSCP Covered” refers to species covered by the City’s Federal Incidental Take Permit (ITP) issued pursuant to Section 10(a) of the Federal Endangered Species Act (FESA) (16 U.S.C. § 1539(a)(2)(A)). Under the FESA, an incidental take permit is required when non-federal activities would result in "take" of a threatened or endangered species. A Habitat Conservation Plan (HCP) must accompany an application for a Federal ITP. Take authorization for federally listed wildlife species covered in the HCP shall generally be effective upon approval of the HCP.
As of April 20, 2010, the City of San Diego may no longer rely on its Federal ITP for authorization for incidental take of the two vernal pool animal species and five plant species (the seven vernal pool species). Development involving the take of the seven vernal pool species requires authorization from the USFWS through the federal process until the City of San Diego completes a new HCP and enters into another Implementing Agreement for a new Federal ITP for those species. No vernal pools occur on the project site.

c. Multi-Habitat Planning Area

One of the primary objectives of the MSCP is to identify and maintain a preserve system which allows for animals and plants to exist at both the local and regional levels. The MSCP has identified large blocks of native habitat having the ability to support a diversity of plant and animal life known as “core biological resource areas.” “Linkages” between these core areas provide for wildlife movement. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. Input from responsible agencies and other interested participants resulted in creation of the City’s MHPA. The MHPA is the area within which the permanent MSCP preserve would be assembled and managed for its biological resources. MHPA lands are those that have been included within the City’s MSCP Subarea Plan for habitat conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region. MHPA lands are considered by the City to be a sensitive biological resource. Neither the vacant site associated with Phase 1/Phase 2 nor the Cliffridge property are within MHPA lands.

d. Land Development Code

The City has developed a set of Biology Guidelines that are to be used as part of the environmental review process to meet the requirements of CEQA, the MSCP, and the Environmentally Sensitive Lands (ESLs). ESLs are defined as:

  sensitive biological resources as those lands included in the MHPA . . . and lands outside of the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, or III; habitat for rare, endangered or threatened species or narrow endemic species.

e. Migratory Bird Treaty Act

The Migratory Bird Treaty Act of 1918 (MBTA) was established to provide protection to the breeding activities of migratory birds throughout the U.S. The MBTA protects the take of migratory birds themselves and their nests.
f. **CDFW Codes 3503 and 3503.5**

Under Section 3503 of the CDFW Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors (birds of prey) and active raptor nests are protected by CDFW Code 3503.5, which states that it is "unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird" unless authorized.

### 4.3.2 Significance Determination Thresholds

Based on the City’s 2011 Significance Determination Thresholds, impacts related to biological resources would be significant if the project would:

- Result in a substantial adverse impact, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS.

- Result in a substantial adverse impact on any Tier I, Tier II, Tier IIIA, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community as identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

Potential impacts to biological resources are assessed through review of the project’s consistency with the City’s ESL Regulations, Biology Guidelines, and MSCP Subarea Plan. Before a determination of the significance of an impact can be made, the presence and nature of the biological resources must be established. Thus, significance determination, pursuant to the City’s Significance Determination Thresholds, proceeds in two steps. The first step consists of determining if significant biological resources are present. The second step is to determine the sensitivity of identified biological resources in terms of direct, indirect, and cumulative impacts that would result from project implementation.

### 4.3.3 Issue 1: Sensitive Species

Would the project result in a substantial adverse impact, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFW or USFWS?
4.3.3.1 Impacts

a. Phase 1/Phase 2

Impacts to approximately 15–20 decumbent goldenbush individuals would occur as a result of the Phase 1/Phase 2 project. Although decumbent goldenbush is CNPS-listed, it is common throughout San Diego County (Reiser 2001). In addition, this is a relatively low number of individuals that would be impacted. Impacts would be less than significant.

Although no sensitive wildlife species were detected that would be directly impacted by project activities, there is a potential for raptors, including Cooper’s hawk, to nest in large eucalyptus and pine trees located in and adjacent to the project area. This species may also perch within the mature pine and eucalyptus trees located on the project site. Cooper’s hawk is a CDFW species of special concern and also is a MSCP covered species. The decline of this species had been caused by urbanization and loss of habitat; however, during the last 20 years, Cooper’s hawk has become adapted to urban areas.

Construction of Phase 2 has the potential to affect active raptor nests by removal of a tree which may serve as perching or activities causing the abandonment of an active nest. Impacts to nesting raptors would be considered significant.

Additionally, potential impacts to nesting birds using the site could occur if construction activities disrupt breeding activities or inadvertently kill birds and destroy nests. The MBTA provides more protection, on a federal level, against unlawful destruction of bird nests and from take of, specifically, migratory birds and their breeding activities. Because bird species were detected on-site, project construction has the potential to impact these species. Impacts to migratory or nesting birds would result in a significant impact.

b. Existing with Improvements Option

Because project components associated with the Existing with Improvements option would occur on a developed site with ornamental landscaping, no impacts to sensitive plant species would occur.

One ornamental tree in the rear of the Cliffridge property near the existing retaining wall would be removed to accommodate the parking lot. Although there is a potential for raptors to nest in nearby large eucalyptus trees, trees on the Cliffridge property would remain. Construction activities for the on-site parking lot would involve demolition of the garage and patio and laying asphalt for a new parking lot. With the limited use and type of construction equipment combined with the short-term nature of construction required for a parking lot, impacts to raptors would be less than significant.
4.3.3.2 Significance of Impacts

a. Phase 1/Phase 2

Impacts to decumbent goldenbush would not be considered significant due to the number of occurrences in the County and the relatively low number of individuals being impacted. Cooper’s hawk is a CDFW species of special concern that could potentially occur on or adjacent to the project site. Because clearing and construction activities associated with Phase 1/Phase 2 could be disruptive to raptors including Cooper’s hawk and breeding or nesting birds, direct and indirect construction project impacts would be significant.

b. Existing with Improvements Option

Direct loss of a single ornamental tree in order to construct the new parking lot and short-term activity for construction of the parking lot and interior renovation of the existing on-site structure would not require substantial clearing or grading or result in excessive construction noise affecting off-site resources. Direct and indirect impacts to raptors and breeding or nesting birds would be less than significant.

4.3.3.3 Mitigation, Monitoring, and Reporting

BIO-1:

To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey within 300 feet of proposed construction to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to the City’s Development Services Department (DSD) for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City’s Biology Guidelines and applicable state and federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City’s Mitigation Monitoring Coordination (MMC) Section or Resident Engineer (RE), and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the precon survey, no further mitigation is required.
4.3.3.4 Significance of Impacts after Mitigation

a. Phase 1/Phase 2

Implementation of the mitigation measure outlined above would reduce potential sensitive species impacts from Phase 1/Phase 2 to a level that is less than significant.

b. Existing with Improvements Option

No mitigation is required.

4.3.4 Issue 2: Sensitive Habitats

Would the project result in a substantial adverse impact on any Tier I, Tier II, Tier IIIA, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development Manual or other sensitive natural community as identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

4.3.4.1 Impacts

a. Phase 1/Phase 2

The project site is not within or adjacent to a City MHPA, and there are no Tier I, Tier II, Tier IIIA, or Tier IIIB Habitats on the project site. The project site is composed of disturbed (Tier IV) and developed lands. Thus, ground disturbance and impacts from the project would occur in urban/developed land areas that are not considered sensitive.

There would be no impacts to sensitive habitats or other sensitive natural communities from the implementation of the project.

b. Existing with Improvements Option

Because activities are proposed on a developed site that is not considered sensitive, no impacts would result and no mitigation is required.

4.3.4.2 Significance of Impacts

Since there are no sensitive habitats on the project site, impacts associated with construction of Phase 1/Phase 2 or the Existing with Improvements option would be less than significant.

4.3.4.3 Mitigation, Monitoring, and Reporting

No mitigation is required for either the Phase 1/Phase 2 or Existing with Improvements option.
4.4 Geology and Soils

Southern California Soil & Testing, Inc. (SCST) prepared an updated geologic reconnaissance of the project site in January 2011. The results of the geotechnical reconnaissance performed by SCST are summarized below and included as Appendix D of this EIR.

4.4.1 Existing Conditions

As described in Chapter 2, Environmental Setting, the project site is composed of a relatively flat ground surface. The vacant site slopes very gently to the south, and is bounded by steep slopes on the north and east. The cut slopes range up to approximately 10 feet in height. The elevation ranges from approximately 400 feet to 407 feet above mean sea level. There are no surface water bodies on-site. Drainage of the site is accomplished via sheet flow in a general southerly direction.

4.4.1.1 Geology and Soils

The project site is located in the coastal plains portion of the Peninsular Ranges Province of California and is underlain by sediments of the Tertiary-age Scripps Formation and Quaternary-age Lindavista Formation. Current regional geologic mapping indicates the site is situated on very old paralic deposits (Qvop 10 and Qvop 10a.). This geologic unit is considered a surficial deposit that was previously included in the Lindavista Formation (Figure 4.4-1). These deposits are composed of massive to coarsely bedded, reddish-brown, silty sand with some gravel and cobble interbedded with sandy cobble conglomerate. No significant fill materials were noted during the site reconnaissance performed by SCST; however, minor amounts of fill associated with the public improvements may exist along the site perimeter and some fill may be associated with the existing structures. In addition, a thin veneer of topsoil/subsoil is present on most of the site.

Very old paralic deposits, commonly identified as the Lindavista Formation, are anticipated to extend to depths of approximately 30 feet below the existing ground surface. The Lindavista Formation is often moderately to highly cemented and excavations with backhoes and other light trenching equipment would likely be slow and difficult to perform. The Lindavista Formation unconformably overlies the Scripps Formation.

a. Scripps Formation

The Scripps Formation is located in the vicinity of the project site and is composed of tan to yellowish-tan, well-consolidated, fine silty sandstone. The structure of the Scripps Formation has been mapped as dipping a few degrees in a north to northwest direction.
b. Lindavista Formation

The Lindavista Formation is anticipated to extend to depths of approximately 30 feet below the existing ground surface. This formation is composed of massive to coarsely bedded, reddish-brown, silty sand with some gravel and cobble interbedded with sandy cobble conglomerate. The Lindavista Formation is often moderately to highly cemented, and excavations with backhoes and other light trenching equipment would likely be slow and difficult to perform. The Lindavista Formation unconformably overlies the Scripps Formation.

4.4.1.2 Groundwater

No groundwater seepage or ponding was noted within the project site or the immediate vicinity. Perched or ponded water may develop upon the well-cemented Lindavista Formation. Groundwater seepage or ponding could occur after development of the project site, even where none was present before development. Groundwater seepage and ponding are often the result of alteration of the permeability characteristics of the soil, alteration in drainage patterns, or increased precipitation or irrigation water.

4.4.1.3 Geologic Structure/Faults

A review of the available geologic literature indicated that the project site is located approximately 650 feet northwest of the potentially active Scripps Fault and 1.3 miles northeast of the active Rose Canyon Fault. Other active faults in the region that could possibly affect the project site include the Coronado Bank, San Diego Trough, and San Clemente fault zones to the west, the Elisnore and San Jacinto fault zones to the northeast, and the Agua Blanca and San Miguel fault zones to the south.

Probable groundshaking levels at the project site could range from slight to strong depending on such factors as the magnitude of the seismic event and the distance to the epicenter. It is likely that the site will experience the effects of at least one moderate to large earthquake during the life of the structure.

4.4.1.4 Geologic Hazards

Based on the Seismic Safety Study maps (City of San Diego 1995), the project site is located within geologic hazards category 52. This category is assigned to level mesas underlain by terrace deposits and bedrock and has a nominal relative risk potential.

a. Landsliding

The project site is located within Area 2 per the Landslide Hazard Identification map number 33. Area 2 is classified as “marginally susceptible” to slope instability and includes gentle to moderate slopes, where slope angles are generally less than 15 degrees. Area 2 includes low-lying bottoms of broad valleys, basins, and large elevated surfaces of Pleistocene terrace deposits. Landslides and other slope failures are rare within the project area, although slope
hazards are possible on some steeper slopes within the area or along its borders. The potential for gross, deep-seated slope failure to affect the project site is negligible.

b. Liquefaction

Liquefaction typically occurs when a site is located in a zone with seismic activity, on-site soils are relatively cohesionless, groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. The potential for liquefaction during a strong earthquake is limited to soils that are in a relatively loose, unconsolidated condition and located below the groundwater table. Materials within the project site are not subject to liquefaction due to soil density as well as lack of shallow groundwater.

c. Tsunamis

Tsunamis are great sea waves produced by a submarine earthquake or volcanic eruption. The potential for a tsunami to affect the project site is nonexistent because the site is approximately 400 feet above mean sea level, and is approximately one mile from the shoreline.

d. Seiches

Seiches are periodic oscillations in large bodies of water such as lakes, harbors, bays, or reservoirs. There are no such large bodies of standing water are located in an area that could affect the project site.

e. Flooding

The project site is located outside the boundaries of the 100-year and the 500-year flood zones, and therefore is not subject to flooding.

4.4.2 Significance Determination Thresholds

Based on the City’s 2011 Significance Determination Thresholds, impacts related to geology and soils would be significant if the project would:

- Expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards.
- Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; and/or
- Result in a substantial increase in wind or water erosion of soils, either on- or off-site.
4.4.3 Issue 1: Geologic Hazards

Would the project expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards; or be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

4.4.3.1 Impacts

a. Phase 1/Phase 2

Since Phase 1/Phase 2 would involve grading for construction and new structures, the potential hazards related to geologic conditions are discussed in more detail below.

Geology and Soils

The native formational materials are generally competent and suitable for the support of low- to mid-rise structures (SCST 2011). Construction would be required to comply with California Building Code (CBC) regulations. Prior to the issuance of grading permits, a site-specific geotechnical investigation with subsurface explorations, laboratory testing, and specific recommendations is required by the City. This report would demonstrate that the project has been designed to accommodate existing soils and complies with the CBC. Because construction is required to comply with CBC regulations and must follow recommendations of a site-specific geotechnical investigation, impacts would be less than significant.

Groundwater

No groundwater seepage or ponding was found within the site or immediate vicinity. However, perched or ponded water may develop upon the well-cemented Lindavista Formation, and groundwater seepage or ponding could occur after development of the project site, even where none was present before development. Standard engineering design for proper surface drainage of irrigation and rainwater, and subsurface drainage structures if necessary, is required for construction of the project. Proper engineering design of drainage features and structures and compliance with the CBC would reduce the risk of groundwater seepage to less than significant.

Geologic Structure/Faults

The project site is located approximately 650 feet northwest of the potentially active Scripps Fault and approximately 1.3 miles northeast of the active Rose Canyon Fault, as well as in the region of various other faults. The project site is located within geologic hazards category 52, which is considered a nominal- to low-risk hazard zone. However, it is likely that the site will experience the effects of at least one moderate to large earthquake during the life of the structure. Design and construction in accordance with prevailing building codes would reduce
the potential for structural collapse due to earthquake ground shaking to an acceptable level; therefore, impacts would be less than significant.

**Geologic Hazards**

**Landslides**

As discussed above, landslides and other slope failures are rare within the project area, although slope hazards are possible on some steeper slopes within the area or along its borders. The project site is generally not susceptible to gross, deep-seated slope failure. The potential for landslide hazards to affect the project site is negligible; therefore, impacts would be less than significant.

**Liquefaction**

Materials within the project site are not considered subject to liquefaction due to soil density as well as lack of shallow groundwater. Liquefaction hazards would be less than significant.

**Tsunamis**

The potential for a tsunami to affect the project site is low due to the elevation of the project site as well as distance from the nearest shoreline. Tsunami hazards would be less than significant.

**Seiches**

There are no large bodies of standing water located in an area that could affect the project site. Seiche hazards would be less than significant.

**Flooding**

The project site is located outside the boundaries of the 100-year and the 500-year flood zones. Hazards from flooding would be less than significant.

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**b. Existing with Improvements Option**

Construction activities would be required to meet applicable regulations and standards, which would be verified before a grading permit is issued. Impacts associated with geologic hazards would be less than significant.

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**4.4.3.2 Significance of Impacts**

**a. Phase 1/Phase 2**

The geotechnical reconnaissance prepared for the project site (and reviewed and accepted by qualified City staff) indicated that there are no geologic hazards of sufficient magnitude to preclude proposed use of the site. Construction would be required to meet applicable
regulations and standards, which would be verified before a building permit is issued, thus ensuring that potential impacts from geological hazards would be less than significant.

b. **Existing with Improvements Option**

Construction activities would be required to meet applicable regulations and standards, which would be verified before a grading permit is issued. Impacts associated with geologic hazards would be less than significant.

### 4.4.3.3 Mitigation, Monitoring, and Reporting

**a. Phase 1/Phase 2**

No mitigation is required.

**b. Existing with Improvements Option**

No mitigation is required.

### 4.4.4 Issue 2: Soil Erosion

Would the project increase wind or water erosion of soils, either on or off the site?

#### 4.4.4.1 Impacts

**a. Phase 1/Phase 2**

Development of the vacant site associated with Phase 1/Phase 2 would include grading activities that remove the existing pavement and cover, thereby exposing soils to potential runoff and erosion. The City Municipal Code’s Grading Regulations require extensive measures to control erosion during and after grading or construction. These include:

- Desilting basins, improved surface drainage, or planting of ground covers required early in the improvement process in areas that have been stripped of native vegetation or areas of fill material.

- Short-term measures such as sandbag placement and temporary detention basins.

- Catch basins.

- Restrictions on grading during the rainy season (November through March), depending on size of the grading operation, and on grading in proximity to sensitive wildlife habitat.

- Immediate post-grading slope revegetation or hydroseeding with erosion-resistant species to ensure coverage of the slopes prior to the next rainy season in accordance with Revegetation and Erosion Control Requirements found in section 142.0411 and
Table 142-04F of the Land Development Code, Landscape Regulations. All required revegetation and erosion control are required to be completed within 90 calendar days of the completion of grading or disturbance (LDC 142.0411[c]).

Although compressible soils are not known to occur on the vacant site associated with Phase 1/Phase 2, a site-specific geotechnical investigation with subsurface explorations, laboratory testing, and specific recommendations would be prepared before a grading permit is issued. Conformance to such mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Incorporation of recommendations described in the geotechnical investigation into grading design would additionally serve to lessen the potential soil erosion impacts (see Appendix D). Thus, potential impacts due to erosion would be less than significant.

b. Existing with Improvements Option

This option would not alter the site in a manner that would increase on- or off-site erosion, as all activities would comply with the grading ordinance. As such, impacts would be less than significant.

4.4.4.2 Significance of Impacts

a. Phase 1/Phase 2

For Phase 1/Phase 2, compliance with the grading ordinance and geotechnical investigation would ensure that erosion impacts would be less than significant.

b. Existing with Improvements Option

The construction activities associated with the Existing with Improvements option would not alter the site in a manner that would increase on- or off-site erosion, as all activities would comply with the grading ordinance. As such, impacts would be less than significant.

4.4.4.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.
FIGURE 4.4-1

Geologic Formations

Data Source: Geologic data from "Geologic Map of the San Diego 30' x 60' Quadrangle, CA" by Kennedy and Tan, 2005

Image source: Copyright 2010 AerialsExpress, All Rights Reserved (flown Feb 2010)
4.5 Energy Use and Conservation

Public Resources Code Section 21100(b)(3) and CEQA Guidelines Section 15126.4 require EIRs to analyze energy use and conservation as it is applicable to the project, and in particular to describe any wasteful, inefficient, and unnecessary consumption of energy caused by a project. The analysis of energy conservation consists of a summary of the energy regulatory framework, the existing conditions at the project site, a discussion of the project’s potential demands on energy resources, and identification of the project design features or mitigation measures that may reduce energy consumption. The potential for impacts to energy conservation are evaluated in accordance with Appendix F of the CEQA Guidelines and federal, state, and regional regulations.

4.5.1 Existing Conditions

4.5.1.1 San Diego Gas and Electric

San Diego Gas and Electric (SDG&E) is the owner and operator of natural gas and electricity transmission and distribution infrastructure in San Diego County. SDG&E is regulated by the California Public Utilities Commission (CPUC). The CPUC sets the gas and electricity rates for SDG&E and is responsible for making sure that California utilities’ customers have safe and reliable utility service at reasonable rates. The project’s energy needs would be supplied through the various combinations of energy resources available within the project area, and involve the anticipated future energy resource use patterns discussed in this section.

Table 4.5-1 lists SDG&E’s current energy sources. As shown in Table 4.5-1, SDG&E uses biomass, geothermal, hydroelectric, solar, and wind sources and obtained 10 percent of its energy from renewable resources in 2009. As directed by the California Renewables Portfolio Standard in Senate Bill 1078, SDG&E and other statewide energy utility providers are targeted to achieve a 33 percent renewable energy mix by 2020. Currently, nearly 11 percent of SDG&E’s renewables procurement is from resources located in San Diego County. The remainder is from renewable energy sources located in Riverside, Orange, and Kern counties.
TABLE 4.5-1
SDG&E POWER CONTENT

<table>
<thead>
<tr>
<th>Energy Source</th>
<th>SDG&amp;E 2009 Power Mix* (actual)</th>
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<tr>
<td>Renewables</td>
<td>10%</td>
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<tr>
<td>- Biomass &amp; waste</td>
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<tr>
<td>Natural Gas</td>
<td>62%</td>
</tr>
<tr>
<td>Nuclear</td>
<td>18%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>100%</td>
</tr>
</tbody>
</table>

SOURCE: SDG&E October 2010.

*86 percent of SDG&E 2009 Power Mix is specifically purchased from individual suppliers.
Note: 10 percent of SDG&E 2009 Power Mix is purchased from individual renewable suppliers.

The Encina Power Plant is the major operating power plant in San Diego County. There are also a number of smaller generating plants in the County that are used as backup during times of peak power demand. These in-region assets are currently capable of generating approximately 2,360 megawatts (MW) of electricity, about 55 percent of the region’s summer peak demand. However, San Diego’s older in-region resources typically run at partial capacity (1,628 MW) due to air quality, high fuel cost, and other reasons. Power generation and power use are not linked geographically. Electricity generated is fed into the statewide grid and is generally available to any users statewide. SDG&E purchases electricity from this statewide grid through various long-term contracts. Natural gas is also imported into southern California and originates from any of a series of major supply basins located from Canada to Texas. Gas is pumped out and shipped to receipt points that connect with major interstate gas pipelines. The Wheeler receipt point, located near Bakersfield, California, is where SDG&E receives deliveries of Canadian natural gas to be received into the Southern California Gas system. Several liquid natural gas plants are proposed in Mexico, which would provide an additional source of natural gas to southern California. SDG&E currently purchases nearly 80 percent of its electricity and natural gas needs from out-of-region energy sources.

4.5.1.2 Regulatory Setting

The following regulations and guidelines provide the framework for energy conservation. According to the majority of these programs and their requirements, the increased and growing demands for non-renewable energy supplies are best addressed through conservation.

Federal and state agencies regulate energy use and consumption through various means and programs. On the federal level, the Department of Transportation (DOT), the Department of
Energy (DOE), and the Environmental Protection Agency (EPA) are three agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate energy consumption related to transportation through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. On the state level, the CPUC and California Energy Commission (CEC) are two agencies with authority over different aspects of energy. The CPUC regulates privately owned utilities in the energy, rail, telecommunications, and water fields. The CEC collects and analyzes energy-related data, prepares statewide energy policy recommendations and plans, promotes and funds energy efficiency programs, and adopts and enforces appliance and building energy efficiency standards.

a. Federal

**Federal Energy Policy and Conservation Act and Amendments**

Minimum standards of energy efficiency for many major appliances were established by the U.S. Congress in the federal Energy Policy and Conservation Act of 1975, and have been subsequently amended by succeeding energy legislation, including the federal Energy Policy Act of 2005. The DOE is required to set appliance efficiency standards at levels that achieve the maximum improvement in energy efficiency that is technologically feasible and economically justified.

**Corporate Average Fuel Economy Standards**

The federal Corporate Average Fuel Economy (CAFE) standard determines the fuel efficiency of certain vehicle classes in the United States. In 2007, as part of the Energy and Security Act of 2007, CAFE standards were increased for new light-duty vehicles to 35 miles per gallon by 2020. In May 2009, President Obama announced plans to increase CAFE standards to require light-duty vehicles to meet an average fuel economy of 35.5 miles per gallon by 2016.

**Energy Independence and Security Act of 2007**

The Energy Independence and Security Act of 2007 established new standards for a few equipment types not already subjected to a standard, and updated some existing standards. Perhaps the most significant new standard it establishes is for general service lighting, which will be deployed in two phases. First, by 2012-2014 (phased over several years), common light bulbs will be required to use about 20-30 percent less energy than present incandescent bulbs. Second, by 2020, light bulbs must consume 60 percent less energy than today’s bulb; this requirement will effectively phase out the incandescent light bulb.
b. State

State Standards Addressing Vehicular Emissions

California Assembly Bill 1493 (Pavley), enacted on July 22, 2002, required the CARB to develop and adopt regulations to reduce greenhouse gases emitted by passenger vehicles and light duty trucks. CARB adopted regulations in 2004, but due to legal delays was not granted the authority by the EPA to proceed until 2009. The adopted regulations apply to the vehicle manufacture of 2009 and later model year vehicles. CARB estimates that the regulations will reduce GHG emissions from light-duty passenger vehicles by an estimated 18 percent in 2020 and by 27 percent in 2030 (AEP 2007). GHG reductions would result from improved vehicle design that includes small engines with superchargers, continuously variable transmissions, and hybrid electric drives. These types of vehicle design would further improve fossil fuel economy, allowing harmonization with the federal rules and CAFE standards for passenger/light-duty vehicles.

California Code of Regulations Title 24, Part 6 California Energy Code

The California Code of Regulations, Title 24, Part 6 is the California Energy Code. This code, originally enacted in 1978 in response to legislative mandates, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California’s energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. The most recent amendments to the Energy Code, known as 2013 Title 24, or the 2013 Energy Code, became effective July 1, 2015. The 2013 Title 24 requires energy use reductions of 25 to 30 percent above the former 2008 Title 24 Energy Code. By reducing California’s energy consumption, emissions of statewide GHGs may also be reduced.

New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The compliance reports must demonstrate a building’s energy performance through use of CEC-approved energy performance software that shows iterative increases in energy efficiency given selection of various heating, ventilation, and air-conditioning (HVAC); sealing; glazing; insulation; and other components related to the building envelope. Title 24 governs energy consumed by the built environment by the major building envelope systems such as space heating, space cooling, water heating, some aspects of the fixed lighting system, and ventilation. Non-building energy use, or plug-in energy use (such as appliances, equipment, electronics, plug-in lighting), are independent of building design and are not subject to Title 25. All new construction in California must meet Title 24 energy standards (CEC 2008). Title 24, which provides energy efficiency standards for residential and nonresidential buildings, was established in 1978 in response to a legislative mandate to reduce California’s energy consumption. The standards are updated periodically to incorporate new energy efficiency technologies and methods. For example, the current Title 24 standards achieve a minimum 15 percent reduction in the combined space heating, cooling, and
water heating energy compared to the previous 2005 Title 24 energy standards. The most recent amendments to the Code are dated 2008, hence “2008 Title 24,” but became effective January 1, 2010. The 2008 Title 24 standards require energy savings of 15-35 percent above the former 2005 Title 24. With 2008 Title 24, all buildings are mandated to achieve a minimum 15 percent reduction in their combined space heating, cooling, and water heating energy compared to the 2005 Title 24 standards. Incentives in the form of rebates and tax breaks are provided on a sliding scale for buildings achieving energy efficiency above this minimum 15 percent reduction.

**California Code of Regulations Title 24, Part 11 California Green Building Code (CALGreen)**

California Code of Regulations, Title 24, Part 11 are the California Green Building Standards. Beginning in 2011, California Green Building Standards Code (CALGreen) instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and low-rise residential buildings, state-owned buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory requirements and may adopt CALGreen with amendments for stricter requirements.

Part 11 of the California Code of Regulations, Title 24, is the California Green Building Standards Code, referred to as CALGreen. The CALGreen was added to Title 24 as Part 11 in 2009, and became effective January 1, 2011. This code institutes mandatory minimum environmental performance standards that include the same energy efficiency requirements as Part 6 of Title 24 with optional Tier I and II standards for even greater energy efficiency. The code also mandates a 20 percent reduction in indoor water use, with voluntary goals and incentives for projects achieving 30 percent and over reduction. Because the provision of water involves large amounts of energy consumption, reduced water consumption would result in reduced energy demand.

**Energy Action Plan**

The state Energy Action Plan, drafted and approved in 2003 by the CPUC, the CEC, and the California Power Authority, provides policy guidance for future resource additions. The goal of the Energy Action Plan (2003, updated in 2005) is to ensure that adequate, reliable, and reasonably-priced electrical power and natural gas supplies, including prudent reserves, are achieved and provided through policies, strategies, and actions that are cost-effective and environmentally sound for California's consumers and taxpayers (State of California 2005).
c. Regional

**SDG&E Long Term Resource Plan**

In 2004, SDG&E filed a long-term resource plan (LTRP) with the CPUC, which identifies how it will meet the future energy needs of customers in SDG&E’s service area. The LTRP identifies several energy demand reduction (i.e., conservation) targets, as well as goals for increasing renewable energy supplies, new local power generation, and increased transmission capacity.

Consistent with Senate Bill 1078, the goals for increased renewable energy supplies in the 2004 LTRP call for acquiring 20 percent of SDG&E’s energy mix from renewables by 2010 and 33 percent by 2020. This bill requires the state’s three investor-owned utilities, including SDG&E, to increase their purchases of power generated from renewable resources in order to reduce reliance on fossil fuels and to reduce GHG emissions.

The LTRP also calls for greater use of in-region energy supplies, including renewable energy installations. By 2020, the LTRP states that SDG&E intends to achieve and maintain the capacity to generate 75 percent of summer peak demand with in-county generation. The LTRP also identifies the procurement of 44 percent of its renewables to be generated and distributed in-region by 2020.

### 4.5.2 Significance Determination Thresholds

Section 15126.4 (a)(1) of the CEQA Guidelines states that an EIR shall describe feasible measures which could minimize significant adverse impacts, including, where relevant, inefficient and unnecessary consumption of energy.

CEQA Guidelines, Appendix F, Energy Conservation provides guidance for EIRs regarding potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. The Resources Agency amended Appendix F to make it clear that an energy analysis is mandatory. However, the Resources Agency also clarified that the energy analysis is limited to effects that are applicable to the project (Final Statement of Reasons for Regulatory Action [Resources Agency 2009]). Furthermore, Appendix F is not described as a threshold for determining the significance of impacts. Appendix F merely seeks inclusion of information in the EIR to the extent relative and applicable to the project. However, for the purpose of this EIR, implementation of the project would be considered to have significant energy impacts if it would:

- Result in the use of excessive amounts of electric power; and/or
- Result in the use of excessive amount of fuel or other forms of energy (e.g., natural gas, oil).
4.5.3 Issue 1: Electricity

Would the construction and operation of the proposed project result in the use of excessive amount of electric power?

4.5.3.1 Impacts

a. Phase 1/Phase 2

According to the U.S. Energy Information Administration (EIA), educational use buildings in California consume an average of approximately 11.0 kilowatts per hour (kWh) of electricity per square foot per year (U.S. EIA 2010). For the purposes of this analysis, the energy consumption for the Phase 1/Phase 2 project was based on educational uses because it is the closest available data type used to the proposed use. As discussed above, CALGreen became effective January 1, 2011. The code institutes mandatory minimum environmental performance standards that are 15 percent more efficient than the previous building code and contain voluntary goals and incentives for projects achieving reductions of 30 percent or more.

Phase 1/Phase 2 would involve the construction of new buildings totaling 6,479 square feet on a vacant lot. The total approximate maximum electricity consumption based on the energy efficient design is estimated to be approximately 61,710 kWh (or 61.71 mWh) per year, at build-out.

Phase 1/Phase 2 would achieve a minimum 15 percent improvement in energy efficiency over previous standards. It would accomplish this through improved HVAC systems and duct seals; enhanced ceiling, attic and wall insulation; EnergyStar appliances; high-efficiency water heaters; energy-efficient three-coat stucco exteriors; energy-efficient lighting; and high-efficiency window glazing. These energy features would undergo independent third party inspection and diagnostics as part of the LEED verification and enhanced commissioning process. Commissioning would be conducted by a commissioning team, approved by the USGBC, and completed for the following energy-related systems, at a minimum:

- HVAC and refrigeration systems and associated controls;
- Lighting and daylighting controls; and
- Domestic hot water systems.

Phase 1/Phase 2 would also include on-site renewable energy in the form of solar photovoltaic panels on top of the carport structures in the surface parking lot. These panels would supply 30 to 50 percent of the on-site energy demand, thus substantially reducing the project’s demand for carbon-based energy. With the photovoltaic panels, the total electricity consumption would be 30,855 to 43,197 kWh, or 30.86 to 43.20 per year.
Given the energy efficient design in accordance with mandated energy efficiency standards, Phase 1/Phase 2 would not result in the use of excessive amounts of electricity during its long-term operation. Also, given that San Diego has a total on-system generation capacity of about 2,360 MW, the energy consumption from the project would not reduce the available supply of energy resources below a level considered sufficient to meet the City’s needs or cause a need for new and expanded facilities.

b. Existing with Improvements Option

Implementation of the Existing with Improvements option would involve converting the Cliffridge property from temporary to permanent use as administrative, religious counseling, and meeting space. This conversion would involve bringing the existing residential structure into compliance with local building codes, but would not involve major modifications or expansion of the existing building operations or performance. Therefore, the energy consumption from the Existing with Improvements option would not reduce the available supply of energy resources below a level considered sufficient to meet the City’s needs or cause a need for new and expanded facilities. Energy impacts associated with the Existing with Improvements option would be less than significant.

4.5.3.2 Significance of Impacts

a. Phase 1/Phase

Phase 1/Phase 2 would not result in the use of excessive amounts of electric power. Thus, impacts would be less than significant.

b. Existing with Improvements Option

The Existing with Improvements option would not result in the use of excessive amounts of electric power. Thus, impacts would be less than significant.

4.5.3.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.

4.5.4 Issue 2: Fuel and Other Forms of Energy

Would the project result in the use of excessive amount of fuel or other forms of energy (e.g., natural gas, oil)?
4.5.4.1 Impacts

In addition to electricity discussed above, long-term operational energy use associated with the project includes natural gas consumption, energy consumption related to obtaining and using water and in disposing of solid waste, and fuel-energy consumption by operation of vehicles.

a. Phase 1/Phase 2

Natural Gas Consumption

Natural gas consumption rates specific to a religious facility of this type are not available. For the purposes of this analysis, it was assumed that the natural gas consumption for Phase 1/Phase 2 was based on office uses because it is the closest available data type use to the proposed use. Typical office uses in California consume an average of 2.0 cubic feet per square foot of natural gas per month (Rimpo and Associates 2007). As discussed above, new projects built in accordance with the current Title 24 energy efficiency standards are 15 percent more energy efficient than those constructed in accordance with the previous building code.

Based on a conservative estimate that Phase 1/Phase 2 would construct 6,600 square feet of space, the total approximate maximum natural gas consumption based on the improved energy efficient design is estimated to be approximately 134,640 cubic feet per year at build-out.

Because the area for Phase 2 is currently vacant, long-term operation would result in an increase in energy consumption compared to existing conditions. Energy would be consumed through daily activities, the delivery of water for potable and irrigation purposes, and daily vehicle use. However, Phase 1/Phase 2 would incorporate design measures (related to electricity, natural gas, and water use) and would be built in accordance with CalGreen. Given its highly energy-efficient design that would exceed mandated energy efficiency standards, the Phase 1/Phase 2 would not result in the use of excessive amounts of natural gas during its long-term operation. In addition, given that San Diego has a total on-system generation capacity of about 2,359 MW, the energy consumption from Phase 2 would not reduce the available supply of energy resources below a level considered sufficient to meet the City’s needs or cause a need for new and expanded facilities. Through compliance with the building standards, the Phase 1/Phase 2 has been designed to consume less-than-average rates of energy, and long-term operational energy impacts would be less than significant.

Water Use

The provision of potable water consumes energy through its conveyance, storage, treatment, and distribution. Phase 1 would not result in an increase or excessive use of water. All new landscaping on the northern portion of the site would be drought tolerant and would be irrigated only during plant establishment with a permanent automatic irrigation system using drip irrigation or low-precipitation and precipitation-matched sprinkle heads. This system would be equipped with valves and other features to minimize water use. Although additional landscaping
would require water, it is not expected to be of an amount or duration that would result in significant demands on energy.

As identified in Section 4.6, Greenhouse Gases, water delivered to the facilities associated with Phase 2 would have an embodied energy demand of 0.0085 kWh per gallon. Water use rates specific to a religious facility of this type are not available. For the purposes of this analysis, it was assumed that the water use for Phase 1/Phase 2 was based on commercial and institutional uses because they are the closest available data type use to the proposed use. A study that summarized and interpreted the commercial and institutional uses of utility-supplied potable water in urban areas found that these uses consume 8 to 16 gallons of water per square foot per year (Water Research Foundation 2000). To be conservative, a water demand rate of 16 gallons per square foot per year was assumed. This would result in a total of 105,600 gallons per year.

In compliance with the recent CALGreen mandates for water conservation and the City’s sustainable landscaping requirements, Phase 2 has been designed to use less water than the current statewide average. By featuring advanced plumbing systems, such as parallel hot water piping or hot water recirculation systems, and fixtures such as ultra-low flow toilets, water-saving showerheads and kitchen faucets, and high-efficiency dishwashers, Phase 2 has been designed to achieve a 20 percent reduction in potable water use. In accordance with CALGreen, this reduction would be demonstrated by verifying each plumbing fixture and fitting meets the 20 percent reduced flow rate or by calculating a 20 percent reduction in the building water use baseline.

In addition to these indoor water use conservation features, Phase 2 employs a drought tolerant landscape design to minimize water use, and incorporates water-efficient irrigation systems. Phase 2 is estimated to consume 84,480 gallons of water per year. The embodied energy associated with this water use would amount to approximately 718 kWh per year. This estimated quantity would likely be less due to reductions from the incorporation of a drought-tolerant landscape plan. Even without the sustainable measures in the landscaping plan, this amount would not reduce the available supply of energy resources. Impacts would be less than significant.

**Solid Waste**

Fuel energy would be consumed by the transportation of solid waste to disposal or recycling facilities. For Phase 1, there would be a temporary increase in solid waste generation during the minor grading and landscaping proposed for the vacant site.

Standards from California Department of Resources Recycling and Recovery (CalRecycle) were used to calculate the solid waste from Phase 2. CalRecycle maintains a list of different waste generation rates for residential, commercial, and industrial uses from a variety of sources. Solid waste rates specific to a religious facility of this type are not available. For the purposes of this analysis, it was assumed that solid waste rates for Phase 1/Phase 2 were based on
educational/school uses because they are the closest available data type use to the proposed use. Educational/school uses generate approximately 0.0013 ton per square foot per year (CalRecycle 2009). Phase 2 would therefore generate 8.58 tons, or 17,160 pounds, of solid waste per year. The disposal of this volume of waste, assuming a once-weekly pickup, a 20-mile round trip distance, and a 6.1 miles-per-gallon fuel economy for disposal vehicles, would consume an approximate 170 gallons of fuel each year.

Because of its conformance to the waste minimization and management requirements, waste generated by the Phase 2 and the energy consumption embodied in its disposal would likely be below average, and therefore would not be excessive.

**Vehicle Use**

Energy in the form of fuel (gasoline) would be consumed by vehicles associated with Phase 1/Phase 2. There would be no increase in staff from this conversion, and no increase from vehicle use during the temporary use of the Cliffridge property during Phase 1. For Phase 2, the Traffic Impact Analysis and Section 4.2 conclude that the 118 new ADTs would be generated. Assuming the SANDAG regional average trip length of 5.8 miles, a total of 684 miles would be traveled each day by project occupants (for 249,806 miles each year). Based on the California Department of Transportation’s (Caltrans) average projected fuel economy of 18.8 miles per gallon for 2020, the project would consume 18,288 gallons of vehicle fuel annually.

As discussed in Section 4.5.1.2, Regulatory Setting, various federal and state regulations on vehicle and fuel manufacture would likely result in the substantial reduction of the project’s vehicle fuel consumption by 2020. Specifically, the CAFE, Low Carbon Fuel Standard (LCFS), and Pavley regulations would increasingly improve the fuel economy of vehicles manufactured after 2009, as well as increase the availability of and conversion to cleaner fuels.

The vacant site associated with Phase 2 is sited within walking distance of UCSD to encourage pedestrian/bicycle travel and avoid the necessity of vehicle use. Phase 2 would include several pedestrian and bicycle amenities that reduce vehicle travel to the site. Phase 2 also proposes to provide bicycle parking facilities, an enhanced bicycle and pedestrian path, and priority parking for low-emitting and fuel efficient vehicles.

In addition, the vacant site associated with Phase 2 is located within less than 0.25 mile of one or more existing stops for public bus lines usable by the Center’s students. One bus stop is located immediately adjacent the property on La Jolla Village Drive just east of Torrey Pines Road. The fuel consumption features proposed in Phase 2 would likely result in below average and not excessive long-term operational energy use from vehicles.
b. Existing with Improvements Option

As the Existing with Improvements option would not result in expansion of the existing structure or operations, no increases in natural gas consumption, water use, solid waste, or vehicle use would result from the permanent operation at the Cliffridge property. Thus, this option would not result in new or excessive uses of fuel or other energy. Impacts would be less than significant.

4.5.4.2 Significance of Impacts

a. Phase 1/Phase 2

Measures to reduce wasteful, inefficient, and unnecessary consumption of energy during operation of Phase 2 have been incorporated into the project design. As such, impacts from implementation of Phase 1/Phase 2 would be less than significant.

b. Existing with Improvements Option

The Existing with Improvements option would not result in expansion of the existing structure or operations and would not result in new or excessive uses of fuel or other energy. Impacts would be less than significant.

4.5.4.3 Mitigation, Monitoring, Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.
4.6 Greenhouse Gases

The following section addresses effects of the project with regard to greenhouse gas (GHG) emissions. The results and conclusions of a GHG technical report prepared for the project by RECON Environmental are summarized below. The report is included in its entirety as Appendix E of this EIR. In December 2015, the City Council adopted a Climate Action Plan (CAP) that outlines the actions that the City would undertake to achieve its proportional share of state GHG emission reductions. In July 2016, the City Council adopted a CAP Consistency Checklist and a new GHG significance threshold requiring CAP consistency in order to rely on the CAP for cumulative impacts analysis of GHG emissions. Projects that trigger environmental review pursuant to CEQA are required to prepare a CAP Consistency Checklist to show that relevant measures required by the CAP are implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. If project consistency is demonstrated, no further GHG analysis is required.

The following section has been revised to discuss Hillel’s consistency with the City CAP as reflected in the CAP Consistency Checklist for the Hillel Project (Checklist), which replaces the GHG technical report as Appendix E.

4.6.1 Existing Conditions

Global climate change is a change in the average weather of the earth, which can be measured by wind patterns, storms, precipitation, and temperature. The earth’s climate is in a state of constant flux with periodic warming and cooling cycles. Extreme periods of cooling are termed “ice ages,” which may then be followed by extended periods of warmth. For most of the earth’s geologic history, these periods of warming and cooling have been the result of many complicated, interacting natural factors that include volcanic eruptions which spew gases and particles (dust) into the atmosphere, the amount of water, vegetation, and ice covering the earth’s surface, subtle changes in the earth’s orbit, and the amount of energy released by the sun (sun cycles). However, since the beginning of the Industrial Revolution around 1750, the average temperature of the earth has been increasing at a rate that is faster than can be explained by natural climate cycles alone.

With the Industrial Revolution came an increase in the combustion of carbon-based fuels such as wood, coal, oil, natural gas, and biomass. Industrial processes have also created emissions of substances that are not found in nature. This in turn has led to a marked increase in the emissions of gases that have been shown to influence the world’s climate. These gases, termed “greenhouse” gases, influence the amount of heat that is trapped in the earth’s atmosphere. Because recently observed increased concentrations of GHGs in the atmosphere are related to increased emissions resulting from human activity, the current cycle of “global warming” is generally believed to be largely due to human activity. Of late, the issue of global warming or global climate change has arguably become the most important and widely debated
environmental issue in the United States and the world. Because climate change is caused by
the collective of human actions taking place throughout the world, it is quintessentially a global
or cumulative issue.

4.6.1.1 State and Regional GHG Inventories

CARB performed statewide inventories for the years 1990 to 2004 for seven broad sectors of
economic activity: agriculture, commercial, electricity generation, forestry, industrial, residential,
and transportation. Emissions are quantified in million metric tons of carbon dioxide (CO₂)
equivalent (MMTCO₂E). The results indicated statewide GHG emissions in 1990 totaled
433 MMTCO₂E and in 2004 totaled 484 MMTCO₂E. According to data from the CARB, it
appears that statewide GHG emissions peaked in 2004 and are now beginning to decrease
(CARB 2010). Transportation-related emissions consistently contribute the most GHG
emissions, followed by electricity generation and industrial emissions.

In 2006, the University of San Diego School of Law, Energy Policy Initiative Center prepared a
local emissions inventory for the San Diego region that indicated transportation-related GHG
emissions contributed the most countywide, followed by emissions associated with energy use.
The summary of the results for the statewide and local inventories are provided in Appendix E.

4.6.1.2 Regulatory Framework

a. International

The Coordinating Committee on the Ozone Layer was established by the United Nations
Environment Program (UNEP) in 1977, and UNEP's Governing Council adopted the World Plan
of Action on the Ozone Layer. Continuing efforts led to the signing in 1985 of the Vienna
Convention on the Protection of the Ozone Layer. This resulted in the creation of the Montreal
Protocol on Substances That Deplete the Ozone Layer (Montreal Protocol), an international
treaty designed to protect the stratospheric ozone layer by phasing out production of ozone
depleting substances. The treaty was adopted on September 16, 1987 and went into force on
January 1, 1989.

Similar to the events that led to the Montreal Protocol, to address growing concern about global
climate change, 191 countries including the United States joined an international treaty known
as the United Nations Framework Convention on Climate Change (UNFCCC). The UNFCCC
recognizes that the global climate is a shared resource that can be affected by industrial and
other emissions of GHG, and that set an overall framework for intergovernmental efforts to
tackle the challenges posed by global climate change. Under this treaty, governments gather
and share information on GHG emissions, national policies and best practices; launch national
strategies for addressing GHG emissions and adapting to expected impacts, including the
 provision of financial and technological support to developing countries; and cooperate in
preparing for adaptation to the impacts of climate change. The UNFCCC entered into force on March 21, 1994. However, this treaty generally lacked powerful, legally binding measures.

The Kyoto Protocol (Protocol), adopted in December 1997, shares the UNFCCC’s objective, principles, and institutions, as it significantly strengthens the UNFCCC by committing industrialized countries to individual, legally binding targets to limit or reduce their GHG emissions. Only parties to the UNFCCC that have also become parties to the Protocol are bound by the Protocol’s commitments. More than 161 countries, constituting 55 percent of global emissions, are under the protocol. Although former U.S Vice President Al Gore symbolically signed the Protocol in 1998, the Protocol has not been formally adopted by the U.S Senate.

b. Federal

The U.S. developed the Climate Change Action Plan (CCAP) in 1993, which consists of initiatives that involve all economic sectors and aims at reducing all significant GHG. The CCAP, backed by federal funding, cultivates cooperative partnerships between the government and the private sector to establish flexible and cost-effective ways to reduce GHG emissions within each sector. The CCAP encourages investments in new technologies, but also relies on previous actions and programs focused on saving energy, reducing transportation emissions, improving forestry management, and reducing waste.

In 2002, the U.S. set a goal to reduce its GHG Emissions Intensity (the ratio of GHG emissions to economic output) by 18 percent by 2012 through various reduction programs, including those identified in the CCAP. New programs included the Energy Star program, which labels energy efficient appliances and products, and the Green Power Partnership, which promotes replacing electricity consumption with green (i.e., renewable) energy sources.

With regard to the transportation sector, the national CAFE standards determine the fuel efficiency of certain vehicle classes in the U.S. After no changes since 1990, in 2007 the CAFE standards were increased for new light-duty vehicles to 35 miles per gallon by 2020. In May 2009, President Obama announced plans to increase these CAFE standards to 35.5 miles per gallon by 2016. With improved gas mileage, fewer gallons of transportation fuel would be combusted to travel the same distance, thereby reducing nationwide GHG emissions associated with vehicle travel.

On June 26, 2009, the U.S. House of Representatives passed the American Clean Energy and Security Act. The Act establishes a cap-and-trade plan for GHG, under which the government sets a limit (cap) on the total amount of GHG that can emitted from large U.S. sources. It requires a 17 percent emissions reduction from 2005 levels by 2020 and includes a renewable electricity standard that will require electricity providers to produce 20 percent of its electricity from renewable sources by 2020. The bill has not yet been approved by the Senate.
c. State

The State of California has a number of policies and regulations that are either directly or indirectly related to GHG emissions. Only those most relevant to land use development projects are included in this discussion.

Executive Order S-3-05

Executive Order (EO) S-3-05, signed by Governor Schwarzenegger on June 1, 2005, established the following GHG emission reduction targets for the state of California:

- By 2010 reduce GHG emissions to 2000 levels;
- By 2020 reduce GHG emissions to 1990 levels;
- By 2050 reduce GHG emissions to 80 percent below 1990 levels.

Assembly Bill 32

In response to EO S-3-05, the California legislature passed Assembly Bill (AB) 32, the “California Global Warming Solutions Act of 2006,” which was signed by the governor on September 27, 2006. It required the CARB to adopt rules and regulations that would reduce statewide GHG emissions to 1990 levels by 2020.

In order to assess the scope of the reductions needed to return to 1990 emissions levels, CARB first estimated 2020 business-as-usual (BAU) GHG emissions. These are the GHG emissions that would be expected to occur in the absence of any state GHG reduction measures. After estimating that statewide 2020 BAU GHG emissions would be 596 MTCO₂E, CARB then developed a Scoping Plan that identified measures to reduce BAU emissions by approximately 174 MTCO₂E (an approximate 30 percent reduction) by 2020. As indicated in Table 4.6-3, the majority of reductions is directed at the sectors with the largest GHG emissions contributions—transportation and electricity generation—and involve statutory mandates affecting vehicle or fuel manufacture, public transit, and public utilities (CARB 2008a).

California Code of Regulations Title 24, Part 11 California Green Building Code (CALGreen)

CALGreen was previously discussed in Section 4.5.1.2(b), Energy, and requires that every new building reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials. It also requires separate water meters for nonresidential buildings’ indoor and outdoor water use, with a requirement for moisture-sensing irrigation systems for larger landscape projects and mandatory inspections of energy systems (e.g., heat furnace, air conditioner, and mechanical equipment) for nonresidential buildings over 10,000 square feet to ensure that all are working at their maximum capacity and according to their design efficiencies.

CALGreen additionally provides incentives for green building design which exceed these mandatory minimums through adherence to Tier I and Tier II optional standards. Projects that
conform to these Tier standards would further reduce their energy demand and resulting GHG emissions associated with electricity generation. The CARB estimates that the mandatory provisions will reduce GHG emissions (CO$_2$ equivalent) by 3 MTCO$_2$E in 2020. With regard to public utilities/electricity generation, the CARB Scoping Plan identifies two key GHG reduction measures: the Renewables Portfolio Standard, which promotes diversification of the state’s electricity supply and requires a 33 percent renewable energy mix statewide by 2020; and the Million Solar Roofs Program, which requires publicly owned utilities to adopt, implement, and finance solar incentive programs to lower the cost of solar systems. Combined, CARB estimates that full achievement of the Renewables Portfolio Standard and Million Solar Roofs Program would decrease statewide GHG emissions by 13 percent by 2020.

**Assembly Bill 1493**

In relation to the transportation sector, AB 1493 (also referred to as Pavley or the California Light-Duty Vehicle Greenhouse Gas Standards) was enacted on July 22, 2002. It required the CARB to develop and adopt regulations to lower GHG emissions from passenger vehicles and light duty trucks to the maximum extent technologically feasible, beginning with the 2009 model year. CARB adopted regulations in 2004, but due to litigation and delays from the U.S. EPA was not granted authority to proceed until June 2009. With this action, it is expected that the new regulations (Pavley I and II) will reduce GHG emissions from California passenger vehicles by about 18 percent statewide. These reductions are to come from improved vehicle technologies such as small engines with superchargers, continuously variable transmissions, and hybrid electric drives.

**Low Carbon Fuel Standard**

Another key vehicle emission reduction measure identified in the CARB Scoping Plan is the Low Carbon Fuel Standard. Signed as EO S-01-07 by Governor Schwarzenegger on January 18, 2007, it directs that a statewide goal be established to reduce the carbon intensity of California’s transportation fuels by at least 10 percent by 2020. CARB approved the Low Carbon Fuel Standard as a discrete early action item. EO S-01-07 also instructs the CalEPA to coordinate activities between the University of California, the CEC, and other state agencies to develop and propose a draft compliance schedule to meet the 2020 target.

Also identified in the CARB Scoping Plan to address vehicle emissions is the Regional Transportation-related GHG Targets measure. This measure identifies policies to reduce transportation emissions through changes in future land use patterns and community design, as well as through improvements in public transportation, all of which are intended to reduce vehicle miles traveled (VMT). By reducing VMT, vehicle GHG emissions would be reduced. Improved planning and the resulting development are seen as essential for meeting the AB 32/EO S-3-05 2050 emissions target (CARB 2008a). This measure is linked to SB 375, which directs that regional emissions targets be established for passenger vehicles by Metropolitan Planning Organizations in their Regional Transportation Plans (RTP) as a Sustainable Communities Strategy to promote smart growth development.
d. Local

**City of San Diego Climate Action Plan**

In December 2015, the City adopted its CAP. The CAP identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a BAU projection for emissions at 2020 and 2035, state targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy- and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency. Accounting for future population and economic growth, the City projects GHG emissions will be approximately 15.9 MMTCO$_2$E in 2020 and 16.7 MMTCO$_2$E in 2035. To achieve its proportional share of the state reduction targets for 2020 (AB 32) and 2050 (EO S-3-05), the City would need to reduce emissions below the 2010 baseline by 15 percent in 2020 and 50 percent by 2035. To meet these goals, the City must implement strategies that reduce emissions to approximately 11.0 MMTCO$_2$E in 2020 and 6.5 MMTCO$_2$E in 2035. Through implementation of the CAP, the City is projected to reduce emissions even further below targets by 1.2 MMTCO$_2$E by 2020 and 205,462 MTCO$_2$E by 2035.

As a means to provide a qualified GHG reduction plan pursuant to State CEQA Guidelines Section 15183.5, the City created a CAP Checklist to be utilized by projects to demonstrate compliance with the measures identified in the CAP.

**San Diego Sustainable Community Program**

In 2002, the San Diego City Council unanimously approved the San Diego Sustainable Community Program and requested that an Ad Hoc Advisory Committee be established to provide recommendations that would decrease GHG emissions from City operations. Actions identified in the Sustainable Community Program include: participation in the International Council for Local Environmental Initiatives (ICLEI) Cities for Climate Protection (CCP) campaign to reduce GHG emissions, and in the California Climate Action Registry; establishment of a reduction target of 15 percent by 2010, using 1990 as a baseline; and direction to use the recommendations of the Ad Hoc Advisory Committee as a means to expand the GHG Emission Reduction Action Plan for the City organization and broaden its scope to include community actions.

**Cities for Climate Protection**

As a participant in the ICLEI CCP Program, the City made a commitment to voluntarily decrease its GHG emissions by 2030. The Program includes five milestones: (1) establish a CCP campaign, (2) engage the community to participate, (3) sign the U.S. Mayors Climate Protection Agreement, (4) take initial solution steps, and (5) perform a GHG audit. The City has advanced past milestone 3 by signing the Mayor’s agreement and establishing actions to decrease City operations’ emissions.
Climate Protection Action Plan

In July 2005, the City developed a Climate Protection Action Plan (CPAP) that identifies policies and actions to decrease GHG emissions from City operations. Recommendations included in CPAP for transportation included measures such as increasing carpooling and transit ridership, improving bicycle lanes, and converting the City vehicle fleet to low-emission or non-fossil-fueled vehicles. Recommendations in the CPAP for energy and other non-transportation emissions reductions included increasing building energy efficiency (i.e., requiring that all City projects achieve the USGBC’s LEED Silver standard) and increasing shade tree and other vegetative cover plantings, among other efforts. The recently amended City General Plan includes Policy CE-A.13 to regularly monitor and update the CPAP.

Sustainable Building Policies

In Council Policy 900-14 “Green Building Policy” adopted in 1997, Council Policy 900-16 “Community Energy Partnership,” and the updated Council Policy 900-14 “Sustainable Buildings Expedite Program” last revised in 2006, the City establishes a mandate for all City projects to achieve the USGBC’s LEED silver standard for all new buildings and major renovations over 5,000 square feet. Incentives are also provided to private developers through the Expedite Program, where green building projects get expedited project review and discounted project review fees.

General Plan

The City General Plan includes several climate change-related policies to ensure that GHG emissions reductions are imposed on future development and City operations. For example, Conservation Element policy CE-A.2 aims to “reduce the City’s carbon footprint” and to “develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth” related to climate change. The Land Use and Community Planning, Mobility, Urban Design, and Public Facilities and Safety Element also contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency.

4.6.1.3 Regional Climate Action Plan

The SANDAG Regional Climate Action Plan is a long-range policy (year 2030) that focuses on transportation, electricity and natural gas sectors. It is a complement to the Regional Energy Strategy 2030 Update and feeds into the SANDAG RTP and Regional Comprehensive Plan. It is currently in process of being prepared.

As indicated above, per the requirements of SB 375, the San Diego region will be required to reduce greenhouse gas emissions from cars and light trucks 7 percent per capita by 2020 and 13 percent by 2035 (SANDAG 2010a). These reduction targets will be fed into the Sustainable
Communities Strategy being prepared for the San Diego region, which will also then feed into the 2050 RTP.

4.6.1.4 Existing GHG Emissions

There are numerous GHGs, both naturally occurring and artificial. The most common GHGs include carbon dioxide, methane, and nitrous oxide which are produced by both natural and anthropogenic (human) sources. The remaining gases, such as hydrofluorocarbons, perfluorocarbon, and sulfur hexafluoride, are the result of human processes, are not of primary concern to the project.

The potential of a gas to trap heat and warm the atmosphere is measured by its “global warming potential” or GWP. Specifically, GWP is defined as the cumulative radiative forcing—both direct and indirect effects—integrated over a period of time from the emission of a unit mass of gas relative to some reference gas (U.S. EPA 2002).

4.6.1.5 Implications of Climate Change

The increase in the earth’s temperature is expected to have wide ranging effects on the environment. Although global climate change is anticipated to affect all areas of the globe, there are numerous implications of direct importance to California. Statewide average temperatures are anticipated to increase by between 3 and 10.5 degrees Fahrenheit by 2100. Some climate models indicate that this warming may be greater in the summer than in the winter. This could result in widespread adverse impacts to ecosystem health, agricultural production, water use and supply, and energy demand. Increased temperatures could reduce the Sierra Nevada snowpack and put additional strain on the region’s water supply. In addition, increased temperatures could result in lower inversion levels leading to a decrease in air quality. It is important to note that even if GHG emissions were to be eliminated or dramatically reduced, it is projected that the effect of those emissions would continue to affect global climate for centuries.

4.6.2 Significance Determination Thresholds

In accordance with CEQA Section 15064.4, the GHG significance thresholds used in this analysis are based on the project’s consistency with the City’s adopted CAP. Appendix G of the 2010 CEQA Guidelines in consideration of thresholds of significance adopted by other public agencies and the recommendations of experts. Thus, implementation of a project would be considered to have a significant climate change impacts if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, specifically the City CAP.
The City is using the California Air Pollution Control Officers Association (CAPCOA) report “CEQA & Climate Change”, dated January 2008, as an interim screening threshold to determine whether a GHG analysis would be required for projects. A 900-MTCO$_2$E per year screening threshold for determining when an air quality analysis is required was chosen based on available guidance from the CAPCOA white paper. The CAPCOA report references the 900-metric-ton guideline as a conservative threshold for requiring further analysis and mitigation. This emissions level is based on the amount of vehicle trips, the typical energy and water use, and other factors associated with projects. CAPCOA identifies the following project types that are estimated to emit approximately 900-MTCO$_2$E of GHGs annually as shown in Table 4.6-1.

**TABLE 4.6-1**

<table>
<thead>
<tr>
<th>Project Type</th>
<th>Project Size that Generates Approximately 900-MTCO$_2$E of GHGs per Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Family Residential</td>
<td>50 units</td>
</tr>
<tr>
<td>Apartments/Condominiums</td>
<td>70 units</td>
</tr>
<tr>
<td>General Commercial Office Space</td>
<td>35,000 square feet</td>
</tr>
<tr>
<td>Retail Space</td>
<td>11,000 square feet</td>
</tr>
<tr>
<td>Supermarket/Grocery Space</td>
<td>6,300 square feet</td>
</tr>
</tbody>
</table>

Although Phase 1/Phase 2 consists of a relatively small square footage, its use is not identified in Table 4.6-1. The City therefore considers an analysis of the GHG emissions that would be generated by Phase 1/Phase 2 to be pertinent. In particular, the analysis is to determine whether GHG emissions from Phase 1/Phase 2 would exceed 900-MTCO$_2$E.

Phase 1/Phase 2 would involve the construction of three individual structures with an overall GFA of 6,479 square feet, situated around a central outdoor courtyard. Therefore, the GHG analysis evaluated emissions from the proposed construction and operation of the Phase 1/Phase 2 project to determine what, if any, cumulative impacts would result through project implementation.

### 4.6.3 Issue 1: GHG Emissions

Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

#### 4.6.3.1 Impacts

**a. Phase 1/Phase 2**

As stated in the first significance threshold in Section 4.6.2, if a project were to generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment it would result in a cumulatively significant climate change impact. Specifically, in accordance with
the City’s interim screening and threshold criteria, the project would be considered to emit potentially significant GHG emissions if it were to emit GHGs in excess of 900 MTCO$_2$E.

For Phase 1/Phase 2, emission estimates were calculated for the three GHGs of primary concern (CO$_2$, methane [CH$_4$], and nitrous oxide [N$_2$O]) that would be emitted from project construction and from the five sources of operational emissions: on-road vehicular traffic, electricity generation, natural gas consumption, water usage, and solid waste disposal. The emission factors used to calculate vehicle, construction, electricity and natural gas GHG emissions are shown in Table 4.6-2.

**TABLE 4.6-2**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Dioxide</td>
<td>19.564</td>
<td>22.37*</td>
<td>4,340</td>
<td>120,000</td>
</tr>
<tr>
<td>Methane</td>
<td>0.00055</td>
<td>0.00128*</td>
<td>0.0111</td>
<td>2.3</td>
</tr>
<tr>
<td>Nitrous Oxide</td>
<td>0.0002</td>
<td>0.00057*</td>
<td>0.0192</td>
<td>2.2</td>
</tr>
</tbody>
</table>


**Transportation-Related Emissions**

Phase 2 would generate 58 ADT (see Appendix B). Assuming a regional average trip length of 6.8 miles (SANDAG 2009), a total of 336 miles would be traveled each day. Based on an average fuel economy of 18.80 miles per gallon (Caltrans 2009), Phase 2 would consume 6,531 gallons of vehicle fuel annually. This would result in the emission of 58.18 MTCO$_2$E each year, assuming BAU.

There are several plans, policies, and regulations aimed at reducing transportation-related GHG emissions statewide by 2020. These regulations would reduce statewide transportation-related GHG emissions by increasing average vehicle fuel economy, decreasing engine combustion emissions, and decreasing average VMT and trip length.

It can be assumed that vehicles associated with the Phase 2 would benefit from the new regulations, and associated vehicle emissions would accordingly decrease. By accounting for the Scoping Plan measures already adopted, the estimated vehicle emissions associated with Phase 2 could decrease by nearly 30 percent, resulting in vehicular GHG emissions of 41.01
MTCO₂E. These transportation-related emissions reductions would be achieved through mandatory regulations applicable to all vehicle emissions within the state and are not attributable to specific GHG reduction features of Phase 2.

Non-Transportation-Related Emissions

Electricity Emissions

Electric power generation accounted for the second largest sector contributing to both inventoried and projected statewide GHG emissions, comprising 24 percent of the projected total 2020 statewide BAU emissions (CARB 2008b). Buildings use electricity for lighting, heating, and cooling. Electricity generation entails the combustion of fossil fuels, including natural gas and coal, which are then stored and transported to end users. A building’s electricity use is thus associated with the off-site or indirect emission of GHGs at the source of electricity generation (power plant). Generation rates are available for a variety of land uses. For each GHG source, the land use type most similar to Phase 1/Phase 2 was selected from the available generation rate data. Emissions for Phase 2 were calculated using average electricity consumption rates of 11.0 kWh per square foot per year for educational uses (U.S. EIA 2010) and the emission factors in Table 4.6-2. Phase 2 would involve the construction of three individual structures with an overall GFA of 6,479 square feet. The total annual electricity consumption associated with Phase 2 without GHG-reducing design features (i.e., BAU) was calculated to be 72.60 MWh. This equates to the emission of 44.33 MTCO₂E each year.

Given current Title 24 energy efficiency standards, Phase 1/Phase 2 design would achieve a 15 percent or greater efficiency than 2005 Title 24. This would reduce emission to 37.68 MTCO₂E each year. Additionally, given energy-efficient design features (photovoltaic solar panels), the total annual electricity consumption associated with Phase 2 with GHG-reducing design features would be reduced by approximately 30 to 50 percent. Phase 2’s GHG emissions would be reduced to approximately 26.38 MTCO₂E emissions each year, assuming a 30-percent reduction in energy supplied from off-site sources.

Natural Gas Emissions

Buildings combust natural gas primarily for heating and cooking purposes, resulting in the emission of GHGs. GHG emissions associated with natural gas combustion are estimated by multiplying the project square footage by average natural gas consumption rates for office uses and then by their respective GHG emissions factors. Natural gas consumption rates specific for a religious facility are not available. For the purposes of this analysis, it was assumed that the natural gas consumption for Phase 1/Phase 2 was based on office uses because it is the closest available data type use to the proposed use. The statewide average monthly natural gas consumption rate for office use was 2.0 cubic feet per square foot prior to the current Title 24 building code (Rimpo and Associates 2007). Given current Title 24 energy efficiency standards,
Phase 1/Phase 2 design would achieve a 15 percent or greater efficiency than the measured statewide average. A natural gas consumption rate of 1.7 cubic feet per square foot per year was thus used in the GHG calculations.

The total quantity of natural gas estimated to be consumed by the BAU project-equivalent each year would be 0.13 million cubic feet. Using the emission factors in Table 4.6-2 for natural gas consumption, this equates to the emission of approximately 7.37 MTCO₂E each year.

**Water Emissions**

The provision of potable water consumes large amounts of energy associated with source and conveyance, treatment, distribution, end use, and wastewater treatment. This type of energy use is known as embodied energy. The GHG emissions associated with water use are calculated by multiplying the embodied energy in a gallon of potable water by the total number of gallons projected to be consumed by Phase 1/Phase 2 and then by the electricity generation GHG emissions factors. For these estimates, it is assumed that water delivered to the project site would have an embodied energy of 2,779 kWh/acre foot, or 0.0085 kWh/gallon (Torcellini 2003).

For the purposes of this analysis, potable water use for Phase 1/Phase 2 was based on institutional uses because it is the closest available data type use to the proposed use. A Water Research Foundation and American Waterworks Association study that summarized and interpreted the institutional uses of utility-supplied potable water in urban areas found that these uses consume 8 to 16 gallons of water per square foot per year. However, this average range of these facilities’ water consumption does not reflect the increased water conservation standards to which Phase 1/Phase 2 would be built.

CALGreen became effective January 2011 and mandates a minimum 20 percent improvement in water conservation over the existing state plumbing code. Specifically, CALGreen mandates a 20 percent reduction in indoor water use, with voluntary goals and incentives for projects achieving a reduction of 30 percent or more. To estimate the water consumption and associated GHG emissions for Phase 1/Phase 2, the existing average rate of water consumption for institutional uses (the higher 16 gallon value) was reduced by 20 percent. The adjusted annual water use rate of 12.8 gallons per square foot was multiplied by the total square footage of 6,600 to obtain the projected annual water consumption of 84,480 gallons per year.

The embodied energy associated with this volume of water use amounts to approximately 718 kWh per year. Multiplying this value by the electricity emission factors in Table 4.6-6, the GHG emissions that would be associated with Phase 1/Phase 2’s water use were calculated to be 0.44 MTCO₂E each year. This estimated quantity would likely be less due to the unquantifiable reductions that would come from the project’s incorporation of a drought-tolerant landscape design in accordance with the City’s General Plan Policy CE-A.11 and LEED requirements.
**Solid Waste Emissions**

The disposal of solid waste produces GHG emissions from anaerobic decomposition in landfills, incineration, and transportation of waste. California Department of Resources Recycling and Recovery (CalRecycle) maintains a list of different waste generation rates for residential, commercial, industrial, and institutional uses from a variety of sources. Educational/school uses are listed as generating approximately 0.0013 ton per square foot per year (CalRecycle 2009). Phase 1/Phase 2 would thus generate approximately 17,160 pounds, or 8.58 tons, of solid waste annually. With CalRecycle’s current waste disposal practice in accordance with the statutory 50 percent diversion mandate, the GHG emissions associated with the disposal or diversion of 8.58 tons of waste would equal approximately 1.21 MTCO$_2$E per year.

Phase 1/Phase 2 would include areas for storage and collection of recyclables and divert 75 percent of its construction waste from the landfill. The GHG emissions reductions from these measures cannot be accurately determined at this time. The CARB Scoping Plan includes recycling and waste measures that would reduce statewide emissions by roughly 1 MMTCO$_2$E by 2020. This is to be achieved through improved landfill methane capture. The CARB Scoping Plan also includes other waste sector reduction strategies not counted toward the statewide 2020 emissions reduction target. CARB estimates that these additional waste and recycling sector measures would provide up to an additional 10 MMTCO$_2$E reduction by 2020. Thus, it is possible that the embodied energy and emissions resulting from disposing of Phase 1/Phase 2’s solid waste may decrease somewhat by 2020 due to these measures.

**Construction Emissions**

Construction activities emit GHGs primarily though combustion of fuels (mostly diesel) in the engines of off-road construction equipment and through combustion of diesel and gasoline in the on-road construction vehicles and in the commuter vehicles of the construction workers. Smaller amounts of GHGs are also emitted through the energy use embodied in any water use (for fugitive dust control) and lighting for the construction activity. Every phase of the construction process, including demolition, grading, paving, and building, emits GHG emissions in volumes proportional to the quantity and type of construction equipment used. The heavier equipment typically emits more GHGs per hour of use than the lighter equipment because of their greater fuel consumption and engine design.

Based on all phases of construction, the total estimated GHG emissions associated with constructing Phase 1/Phase 2 would be 554.43 MTCO$_2$E. The Association of Environmental Professionals (2010) has recently recommended that total construction emissions be amortized over 30 years and added to operational emissions. Thus, while construction emissions are not addressed in the CARB Scoping Plan, Phase 1/Phase 2’s estimated construction emissions are added to the project’s operational emissions. This results in an annual BAU construction emission of approximately 18.48 MTCO$_2$E per year.
Total Project Emissions

The total project GHG emissions attributed to construction, vehicle use and building occupancy for Phase 1/Phase 2 are summarized below in Table 4.6-3. As shown, Phase 1/Phase 2 is estimated to generate a worst-case total of 123.36 MTCO2E of GHG emissions each year. This quantity of emissions is what would be generated by the project given compliance with current building codes, but without taking credit for any project-specific reduction measures. By accounting for the project design that includes on-site solar energy, and by accounting for vehicle emissions reductions anticipated by 2020 through state regulations, the project is projected to generate 94.89 MTCO2E each year by 2020. This reduction of 28.47 MTCO2E equates to 27.1 percent less emissions being generated by the project by 2020.

<table>
<thead>
<tr>
<th>Emission Source</th>
<th>Project Compliant with Current Building Code</th>
<th>Project Design with Additional Reductions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transportation/Vehicles</td>
<td>58.18</td>
<td>41.01*</td>
</tr>
<tr>
<td>Electricity Use</td>
<td>37.68</td>
<td>26.38*</td>
</tr>
<tr>
<td>Natural Gas Use</td>
<td>7.37</td>
<td>7.37</td>
</tr>
<tr>
<td>Water Consumption</td>
<td>0.44</td>
<td>0.44</td>
</tr>
<tr>
<td>Solid Waste Disposal</td>
<td>4.21</td>
<td>1.21</td>
</tr>
<tr>
<td>Construction</td>
<td>18.48</td>
<td>18.48</td>
</tr>
<tr>
<td>TOTAL</td>
<td>123.36</td>
<td>94.89</td>
</tr>
</tbody>
</table>

*GHG reductions achieved through State measures affecting vehicle and fuel manufacture by 2020.

The GHG emissions of Phase 1/Phase 2 would not exceed the City’s 900 MTCO2E screening threshold; thus, no further analysis is required. Phase 1/Phase 2’s contribution of GHGs to statewide emissions would be less than significant.

b. Existing with Improvements Option

The Existing with Improvements option would not expand or intensify the existing structure, operations, or vehicle traffic. Therefore, the Existing with Improvements option would not generate GHG emissions in excess of 900 MT, and its cumulative contribution to statewide GHG emissions would be less than significant.

4.6.3.2 Significance of Impacts

a. Phase 1/Phase 2

Phase 1/Phase 2’s worst-case emission of 123.36 MTCO2E per year falls well below the City’s 900 MTCO2E GHG screening threshold that indicates when a significant GHG impact may
occur. Additional GHG-reducing design features would reduce project emissions to 94.89 MTCO₂E per year. Therefore, the Phase 1/Phase 2’s contribution to statewide emissions would be less than significant.

b. Existing with Improvements Option

The Existing with Improvements option would not generate GHG emissions in excess of 900 MT, and its cumulative contribution to statewide GHG emissions would be less than significant.

4.6.3.3 Mitigation, Monitoring, Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.

4.6.43 Issue 21: Project Consistency with Adopted GHG Plans, Policies and Regulations

Would the project conflict with an applicable plan, policy, or regulation of an agency, including the City CAP, adopted for the purpose of reducing the emissions of GHG?

4.6.43.1 Impacts

a. Phase 1/Phase 2

The regulatory plans and policies discussed in Section 4.6.1 above aim to reduce federal, state, and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. Plan goals and regulatory standards are thus largely focused on the automobile industry and public utilities. For the transportation sector, the reduction strategy is generally three pronged: to reduce GHG emissions from vehicles by improving engine design; to reduce the carbon content of transportation fuels through research, funding, and incentives to fuel suppliers; and to reduce the miles these vehicles travel through land use change and infrastructure investments.

For the energy sector, the reduction strategies aim to: reduce energy demand; impose emission caps on energy providers; establish minimum building energy and green building standards; transition to renewable non-fossil fuels; incentivize homeowners and builders; fully recover landfill gas for energy; expand research and development; and so forth.
Local Plans Project Consistency with Regulatory Plans

As discussed above, the Phase 1/Phase 2 project would achieve substantial GHG reductions through sustainable building design that includes improved energy efficiency, on-site renewable energy generation, water conservation, sustainable materials use, and waste reduction. The sustainable design features of Phase 1/Phase 2 are described more fully in Chapter 3, Project Description.

Verification of increased energy efficiencies would be demonstrated based on a performance approach, using a CEC-approved energy compliance software program, in the Title 24 Compliance Reports provided by the project applicant to the City prior to issuance of the building permit. Prior to issuance of a final certificate of occupancy, the energy features would undergo independent third party inspection and diagnostics as part of the LEED verification and commissioning process, with compliance verified by the City’s Building Official as part of the plan check process of the City’s Sustainable Building Expedite Program. Additional inspections may be conducted as needed to ensure compliance. During the course of construction and following completion of the project, the City may require the applicant to provide information and documents showing use of products, equipment, and materials specified on the permitted plans and documents.

The construction plans and specifications of Phase 1/Phase 2 would indicate in the general notes or individual detail drawings the advanced water conservation features, product specifications, and methods of construction and installation that are required to surpass the state plumbing code by a minimum of 20 percent, to achieve a minimum 20 percent reduction in water usage. In accordance with CALGreen criteria, verification of the 20 percent reduction in potable water use shall be demonstrated by verifying each plumbing fixture and fitting meets the 20 percent reduced flow rate or by calculating a 20 percent reduction in the building water use baseline. This documentation would be provided by the project applicant to the City prior to issuance of the building permit. The performance of the water conservation design will be verified through final inspection prior to issuance of a final certificate of occupancy.

Phase 1/Phase 2 would thus be consistent with the City’s General Plan, CPAP, and Sustainable Building goals for private land use development.

Project Consistency with City CAP

The CAP establishes five primary strategies for achieving the goals of the plan. Many of these strategies are specific to City operations; however, there are strategies that could apply to general development projects. The Phase 1/Phase 2 project prepared its CAP Checklist which identifies specific features that are required to be implemented as part of the project. These measures reflect the project’s consistency with the CAP’s assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. As detailed below, the proposed project would be consistent with the CAP, as determined through the use of the CAP
Checklist (refer to Appendix E), and may therefore rely on the CAP for the analysis of GHG emissions:

**Step 1: Land Use Consistency** - The first step in determining CAP consistency for discretionary development projects is to assess the project’s consistency with the growth projections used in the development of the CAP. The project is consistent with the existing general and community plans and zoning regulations and, therefore, able to proceed to an analysis of project consistency with CAP Strategies.

**Step 2: CAP Strategies Consistency** - The second step of the CAP consistency review is to review and evaluate a project’s consistency with the applicable strategies and actions of the CAP.

- **Strategy 1 (Energy and Water Efficient Buildings)** includes goals, actions, and targets with the aim of reducing building energy consumption, including reduction of daily per capita water consumption. The proposed project includes project design features aimed at sustainability and conservation of energy. As identified in the Checklist, these design features include cool/green roofs, plumbing fixtures and fittings that do not exceed the maximum flow rate, and appliances and fixtures that meet the provisions of the California Green Building Standards Code. Specifically, as previously discussed in Section 4.5, the proposed project would achieve a minimum 15 percent improvement in energy efficiency over previous standards. This would be accomplished through improved HVAC systems and duct seals; enhanced ceiling, attic, and wall insulation; EnergyStar appliances; high-efficiency water heaters; energy-efficient three-coat stucco exteriors; energy-efficient lighting; and high-efficiency window glazing.

- **Strategy 2 (Clean and Renewable Energy)** includes goals for passive or zero net energy use for new building design. The proposed project provides parking spaces for electric vehicles. Additionally, as included in the Checklist, the proposed project would be designed to have an energy budget that meets identified performance standards when compared to the Title 24, Part 6 Energy Budget for the Proposed Design Building as calculated by Compliance Software certified by the California Energy Commission. Specifically, the proposed project would include on-site renewable energy in the form of solar photovoltaic panels on top of the carport structures in the surface parking lot. These panels would supply 30 to 50 percent of the on-site energy demand, thus substantially reducing the project’s demand for carbon-based energy.

- **Strategy 3 (Bicycling, Walking, Transit & Land Use)** has a number of goals that relate to land use and planning. As identified in the Checklist, the project would include bicycle parking and 3 percent of the total parking would be reserved for electrical vehicles. The proposed project includes employees and would be required to conform to the requirement for designating parking spaces carpool and fuel efficient vehicles. The project includes a deviation request that would allow the project to provide parking based...
on the specific needs of the facility as determined by existing comparable facilities. The total number of parking to be provided would be 27 spots, inclusive of carpool designated and preferred parking for electric vehicles.

- Additionally, the project would promote walkability by providing a facility within a convenient and walkable (one-quarter mile) distance to activities in the southern portion of the UCSD campus. The proposed project and associated discretionary actions would be consistent with and would implement the CAP. Therefore, impacts associated with GHG emissions would be less than significant.

The City’s CPAP presents numerous strategies and actions to be taken by the City to meet the emissions reduction goals. Many of these strategies are specific to City operations; however, there are strategies that could apply to general development projects. The objectives of Phase 1/Phase 2 which relate to these actions are:

- Contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus.
- Contribute to accomplishing the sustainable development goals through the installation of sustainable design and building practices that would achieve optimal water conservation, on-site renewable energy, natural daylighting and ventilation, and a reduction in vehicle use through enhanced bicycle and pedestrian facilities.
- Exceed City goals to reduce waste and conserve regional landfill space by incorporating design measures that satisfy LEED criteria for 50 to 75 percent diversion (reuse, recycling) of construction and operational waste.

Providing a center within walking distance to the UCSD campus and enhancing the pedestrian environment would contribute to decreasing GHG emissions due to vehicular travel. Phase 1/Phase 2 would complement the transportation goals of the CPAP and not result in a significant impact.

The vacant site associated with Phase 2 is located within less than 0.25 mile of one or more existing stops for public bus lines usable by the Center’s students. In addition, Phase 1/Phase 2 would incorporate sustainable design and materials where practical. Project design features that are anticipated to meet the City’s Sustainable Building policy and LEED Silver certification criteria would serve to reduce or avoid potential environmental effects associated with vehicular transportation, energy and water consumption, materials consumption (particularly consumption of nonrenewable or slowly-renewing resources), indoor air quality, and heat islands. Phase 1/Phase 2 would also include on-site renewable energy in the form of solar photovoltaic panels on top of the carport structures in the surface parking lot. These panels would supply 30 to 50 percent of the on-site energy demand, thus substantially reducing the demand for carbon-based energy. Thus, Phase 1/Phase 2 would not conflict with the energy goals of the CPAP.
**Project Consistency with State Plans**

EO S-3-05 established GHG emission reduction targets for the state, and AB 32 launched the Climate Change Scoping Plan that outlined the reduction measures needed to reach these targets. These include strategies to reduce fossil fuel demand through renewable energy use, increased building energy efficient design, and sustainable building methods to reduce water use, chemical offgasing, heat islands, and waste. Phase 1/Phase 2, by providing energy- and water-efficient building design and on-site renewable energy (to meet 30 to 50 percent of electricity demand), would achieve a substantial reduction in GHG emissions compared to existing buildings emissions and to projected 2020 BAU emissions. Phase 1/Phase 2’s sustainable building design is thus consistent with state GHG reduction goals, climate change adaptation strategies, and the Scoping Plan’s recommendation to expand the use of green building practices in order to reduce the carbon footprint of new buildings.

b. Existing with Improvements Option

The conversion of the Cliffridge property from temporary to permanent use for Hillel would not expand or intensify the existing building operations or vehicle traffic. Therefore, it would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG, and impacts would be less than significant.

**4.6.34.2 Significance of Impacts**

a. Phase 1/Phase 2

Phase 1/Phase 2 would not conflict with an applicable plan, policy, or regulation, including the City CAP, adopted for the purpose of reducing the emissions of GHG, and impacts would be less than significant.

b. Existing with Improvements Option

The Existing with Improvements option would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG, and impacts would be less than significant.

**4.6.34.3 Mitigation, Monitoring, Reporting**

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.
4.7 Historical Resources

Brian F. Smith and Associates, Inc. completed a field and archival investigation of the project site, including an intensive on-foot survey and testing program. The results of the survey and the subsurface testing program are summarized below and explained in detail in the Cultural Resources Study, which is included as Appendix F-1 of this EIR. A Historical Resource Report was also completed for the Cliffridge property. This report is included as Appendix F-2 of this EIR.

4.7.1 Existing Conditions

4.7.1.1 Cultural and Historic Setting

Although the origins of the earliest local inhabitants of the coastal area of La Jolla area remain unclear, the area has a rich and extensive record of prehistoric and historic human activity. According to the background research conducted for this project, institutional records indicate that the project vicinity supported foraging sites for populations of hunter/gatherers, such as the La Jolla and later the Kumeyaay. Following the Hispanic introduction into the region in the mid-1700s, the project area was possibly used in conjunction with agricultural activities of the missions, followed by farming and cattle ranching activities.

Following the early settlements and colonization of San Diego, La Jolla became the site of residences and businesses. From the late 1800s and early 1900s, La Jolla saw the introduction of the City’s first public services, street paving, and transportation systems. As a result of the development of La Jolla, many of the major prehistoric sites in the project area have been disturbed.

4.7.2.1 Known Prehistoric/Historic Resources

a. Records Search

Archaeological records searches were conducted at the South Coast Information Center (SCIC) at San Diego State University and the San Diego Museum of Man (2003, updated in 2007 and 2010). The records searches indicated that no previously recorded cultural resources are located within the project boundary. The SCIC reported 20 sites within one mile of the project site, although several of these sites have been combined (see Appendix F-1, Table 6.0-1). The San Diego Museum of Man reported 16 sites (the same as those reported by SCIC) within one mile of the project site.

The prehistoric sites consist of habitation and resource extraction and processing locations generally associated with both the Archaic and Late Prehistoric subsistence strategies. The complete results of the records searches can be found in Appendix F-1.
Based on the results of a Sacred Lands File search through the Native American Heritage Commission, no pre-recorded Native American cultural resources are reported on the project site or the immediate area.

**b. Survey/Field Inspection Results**

The project site was surveyed in 2003 and 2007. The entire project area/parcel was inspected for artifacts, ecofacts, and features. The majority of the site lacked vegetation, allowing for good ground visibility, but the soil that was visible revealed little evidence of cultural resources.

Three isolated artifacts observed on the surface of the project site were mapped and collected. The artifacts consisted of three small pieces of lithic production waste (flakes). Two of the flakes were made from medium-grained metavolcanic material, while the remaining flake was made from quartzite (see Appendix F-1). In addition to the isolated surface artifacts, a very sparse scatter of less than 10 small pieces of marine shell was observed on the surface of the property. The shells consisted primarily of *Chione* sp. fragments and other unidentified specimens. Because the shell fragments were so sparsely and widely scattered, they were noted but not collected.

**c. Excavation and Historical Resources Testing**

The potential for cultural materials on this property was sufficient to mandate a subsurface assessment because of the number of previously recorded sites in the immediate vicinity and the extensive use of this area by prehistoric groups, as noted by the recorded presence of major occupation sites on Torrey Pines Mesa. A total of 20 shovel test pits were excavated within the parcel. The excavation of the shovel tests demonstrated that the soils on the property are mixed and heavily disturbed, and many of the excavations contained pieces of modern trash. No cultural resources were recovered from the shovel tests. The locations of the datum, surface collections, and excavations as well as detailed locational information for the shovel test excavations are presented in Appendix F-1.

**4.7.2 Regulatory Framework**

Federal, state, and local criteria are used to evaluate the significance of a prehistoric or historic resource.

**4.7.2.1 Federal**

**a. National Register of Historic Places**

Federal criteria are those used to determine eligibility for the National Register of Historic Places (NRHP). The NRHP, established by the National Historic Preservation Act enacted in 1966, is the official lists of sites, buildings, structures, districts, and objects significant in American history, architecture, archaeology, engineering, and culture. The NRHP is administered by the
National Park Service. The NRHP criteria state that the quality of significance is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and are associated with historic events or persons important in our past; embody the distinctive characteristics or represent the work of a master or distinguishable entity; or have yielded information important in prehistory or history.

Certain properties (e.g., ordinary cemeteries, birthplaces or graves of historical figures, properties owned by religious institutions, structures that have been moved or reconstructed, properties primarily commemorative in nature, or properties that have become significant within the last 50 years) are usually not considered for eligibility for the NRHP.

b. Native American Involvement

Native American involvement in the development review process is addressed by several state and federal laws. The most notable of these are the California Native American Graves Protection and Repatriation Act (2001) and the federal Native American Graves Protection and Repatriation Act (1990). These acts ensure that Native American human remains and cultural items be treated with respect and dignity. In addition, Senate Bill 18 spells out requirements for local agencies to consult with identified California Native American Tribes during the development process.

4.7.2.2 State

a. California Register of Historic Resources

Similar to the NRHP, the California Register of Historic Resources (CRHR) program, established in 1992, encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies resources for planning purposes; determines eligibility of state historic grant funding; and provides certain protections under CEQA. State criteria are those listed in CEQA and used to determine whether an historic resource qualifies for the CRHR. CEQA was amended in 1992 to define “historical resources” as a resource listed in or determined eligible for listing on the California Register, a resource included in a local register of historical resources or identified as significant in a historical resource survey that meets certain requirements, and any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be significant. Some resources that do not meet these criteria may still be historically significant for the purposes of CEQA.

Similar to the NRHP, a resource may be listed in the CRHR if it is significant under one of more of the following criteria:

- Associated with historic events or persons important to California’s past
• Embodied the distinctive characteristics or represent the work of a master or distinguishable entity

• Yielded information important in prehistory or history

4.7.2.3 Local

a. Historical Resources Guidelines

The Historical Resources Guidelines of the City’s Land Development Manual identifies the criteria under which a resource may be historically designated. It states that any improvement, building, structure, sign, interior element and fixture, site, place, district, area, or object may be designated a historical resource by the City’s Historical Resources Board if it meets one or more of the following designation criteria:

• Exemplifies or reflects special elements of the City’s, a community’s, or a neighborhood’s historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or agricultural development.

• Is identified with persons or events significant in local, state, or national history.

• Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or crafts.

• Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman.

• Is listed or has been determined eligible by National Park Service for listing on the NRHP or is listed or has been determined eligible by the State Historical Preservation Office for listing on the State Register of Historic Resources.

• Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value, or which represent one or more architectural periods or styles in the history and development of the City.

Under the City’s Historical Resource Guidelines, certain types of resources are typically considered insignificant for planning purposes, such as isolates, sparse lithic scatters, isolated bedrock milling features, shellfish processing stations, and sites and buildings less than 45 years old (City of San Diego 2001b).

In the Historical Resources Guidelines, an archaeological site is defined as at least three associated artifacts/ecofacts within a 40-square-meter area, or as a single feature, and be at least 45 years old (City of San Diego 2001b). Unless demonstrated otherwise, archaeological sites with only a surface component are not typically considered significant. The
determination of an archaeological site’s significance depends on a number of factors specific to that site, including size, type, and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostic artifacts, or datable material; artifact/ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance. According to the City’s Guidelines, all archaeological sites are considered potentially significant (City of San Diego 2001b).

Significance for historic buildings, structures, objects, and landscapes is based on age, location, context, integrity, and association with an important person or event. A resource may be associated with one or more aspects of the criteria detailed above. To determine the significance of the resource, the historic context with which the resource is associated should be identified; second, the resource’s history is evaluated to determine whether it is associated with the historic context in any important way by applying the Historical Resources Board Criteria and identifying the period of significance in which the resource is important; and last, the resource’s historic integrity is assessed.

For a site to have ethnic significance, it must be associated with a burial or cemetery; religious, social, or traditional activities of a discrete ethnic population; an important person or event as defined within a discrete ethnic population; or the mythology of a discrete ethnic population (City of San Diego 2001b).

b. Historical Resources Regulations

The City’s Historical Resources Guidelines address the identification and mitigation of impacts to both prehistoric and historic sites in the City. These Historical Resources Guidelines ensure compliance with local, state, and federal regulations for the management of historical resources. These guidelines are stated in the City’s Historical Resources Regulations (HRR), part of the San Diego Municipal Code (Chapter 14, Article 3, Division 2: Purpose of Historic Resources Regulations or Sections 143.0201-143.0280). The HRR has been developed to implement applicable local, state, and federal policies and mandates. Included in these are the City’s General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966. The City Guidelines cover all properties (historic, archaeological, landscapes, traditional, etc.) that are eligible or potentially eligible for the NRHP. It also covers those same properties that may be significant under state and local laws and registration programs, such as the CRHR and the City’s HRR.

Historical resources, in the HRR context, include “site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city.” These are usually over 45 years old, and they may have been altered or still be in use (City of San Diego 2001b).
c. Native American Involvement

At the local level, Policy HP-A.4.e of the Historic Preservation Element in the General Plan states that Native American monitors should be included during all phases of the investigation of archaeological resources. This would include surveys, testing, evaluations, data recovery phases, and construction monitoring (City of San Diego 2008a).

4.7.3 Significance Determination Thresholds

Based on the City’s 2011 Significance Determination Thresholds, impacts related to historic resources would be significant if the project would:

- Result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including architecturally significant building), structure, or object or site;
- Result in the disturbance of any human remains, including those interred outside of formal cemeteries; and/or
- Result in any impact to existing religious or sacred uses within the potential impact area.

4.7.4 Issues 1 and 2: Prehistoric/Historic Resources and Human Remains

Would the project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including architecturally significant building), structure, or object or site? Would the project result in the disturbance of any human remains, including those interred outside of formal cemeteries?

4.7.4.1 Impacts

a. Phase 1/Phase 2

Due to the location within a coastal area where known prehistoric and historic resources exist and three isolated artifacts were recovered from the surface of the project area, the project site was assessed for any potential for subsurface cultural resources. The subsurface assessment consisted of 20 shovel pits excavated on the project site in order to determine if intact cultural deposits occurred and, if so, their extent and composition.

The excavation of the shovel tests demonstrated that the soils on the property are mixed and heavily disturbed, and many of the excavations contained pieces of modern trash. No cultural resources were recovered from the shovel tests. The archaeological survey and testing program did not result in the discovery of any archaeological sites or features. The survey and excavation concluded that Phase 1/Phase 2 would not impact cultural resources and no further
archaeological considerations are recommended. No cultural deposits were located and no historic sites or structures were identified within the project site.

There are no known burial sites or cemeteries within the project vicinity; therefore, the project is not likely to disturb any human remains. Based on the results of the record search, survey for cultural resources, and a request of the Native American Heritage Commission for spiritually significant and/or sacred sites or traditional use areas, the potential for unanticipated discovery or the disturbance of human remains is low. In the unlikely event of the discovery of human remains during project grading, all contractor and City staff are required to adhere to California Health and Safety Code Section 7050.5. This section of the Health and Safety code requires no further disturbance to occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. With implementation of these procedures, impacts to cultural resources would be less than significant.

b. Existing with Improvements Option

No cultural deposits were located and no historic sites or structures or known burial sites or cemeteries were identified. Similar to Phase 1/Phase 2, the potential for unanticipated discovery or the disturbance of human remains is low. In the unlikely event of the discovery of human remains during project grading, all contractor and City staff are required to adhere to California Health and Safety Code Section 7050.5. This section of the Health and Safety Code requires no further disturbance to occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98.

In regards to historical resources, the City’s Historical Resource Guidelines are used for determining significance under CEQA to reflect a local perspective of historical, architectural, and cultural importance for inclusion on the City’s Historical Resources Register.

The Cliffridge property is more than 45 years old, and thus has been evaluated for its historic significance in relation to the City’s Historical Resource Guidelines (Appendix F-2). The residence and garage at the Cliffridge property do not meet any of the criteria, detailed above in Section 4.7.2.3a (see Appendix F-2). Thus, the Cliffridge property would not be eligible for inclusion on the City’s Historical Resources Register.

In addition to determining the significance of a property under Historical Resource Guidelines criteria, a property must also must possess integrity. Integrity is defined by the NRHP as the “ability of a property to convey and maintain its significance.” The local, state, and national registers recognize seven aspects of integrity—location, design, setting, materials, workmanship, feeling, and association. The Cliffridge property is not directly linked to any historic events, activities, persons, past time, or past place. As a result, the property does not possess, nor has it ever possessed, an associative element for integrity purposes (see Appendix F-2).
The Cliffridge property does not meet any of the City’s Historical Resource Guidelines criteria, nor does it possess an associative element for integrity purposes. Impacts to historical resources under the Existing with Improvements option would therefore be less than significant.

### 4.7.4.2 Significance of Impacts

#### a. Phase 1/Phase 2

The archaeological study indicates that no significant prehistoric, historic, or cultural resources are present within the project site. Regulations addressing the low potential for an unanticipated discovery or disturbance of human remains are summarized in Section 4.7.4.1. Therefore, historic impacts of Phase 1/Phase 2 would be less than significant.

#### b. Existing with Improvements Option

No cultural deposits were located and no historic sites or structures or known burial sites or cemeteries were identified. The Cliffridge property does not meet any of the City’s Historical Resource Guidelines criteria, nor does it possess an associative element for integrity purposes. Impacts to historical resources under the Existing with Improvements option would be less than significant.

### 4.7.4.3 Mitigation, Monitoring, and Reporting

#### a. Phase 1/Phase 2

No mitigation is required.

#### b. Existing with Improvements Option

No mitigation is required.

### 4.7.5 Issue 3: Religious/Sacred Uses

Would the project result in any impact to existing religious or sacred uses within the potential impact area?

#### 4.7.5.1 Impacts

#### a. Phase 1/Phase 2

There are no known religious or sacred uses on-site or within the immediate vicinity of the project site. In addition, the Sacred Land file search did not identify any cultural resources within the project site. Therefore, implementation of Phase 1/Phase 2 would result in less than significant impacts to religious and sacred uses.
b. Existing with Improvements Option

As with Phase 1/Phase 2, implementation of the Existing with Improvements option would result in less than significant impacts to religious and sacred uses.

4.7.5.2 Significance of Impacts

a. Phase 1/Phase 2

Since no religious or sacred uses were identified within the project area, impacts would be less than significant.

b. Existing with Improvements Option

Since no religious or sacred uses were identified within the project area, impacts would be less than significant.

4.7.5.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.
4.8 Noise

The following section is based upon the Noise Technical Report prepared by RECON for the project (Appendix G).

4.8.1 Existing Conditions

4.8.1.1 Existing Noise Standards

Noise standards in the City are expressed in community noise equivalent level (CNEL), a 24-hour A-weighted average decibel level [dB(A)] that accounts for frequency correction and the subjective response of humans to noise by adding 5 dB and 10 dB to the evening and nighttime hours, respectively.

a. Exterior Noise

Noise is evaluated in relation to the noise level standards promulgated in the City General Plan (2008). Phase 1/Phase 2 would construct meeting rooms for religious study, a courtyard, and a library that would serve as a chapel. Phase 1/Phase 2 and the Existing with Improvements option also include the operation of religious offices.

There are two Institutional standards that could apply to the project. Based on the proposed uses, the exterior noise standard applied to the project would be for places of worship is 65 CNEL. While other standards could apply, applicable to higher education institutional facilities is 70 CNEL. These standards are applicable at exterior usable areas. To be conservative, an exterior noise standard of 65 CNEL for a place of worship, this standard would provide the most conservative approach to noise due to its lower threshold was used for this analysis.

b. Interior Noise

Noise-sensitive interior spaces have an interior standard of 45 CNEL (City of San Diego 2008b). The City assumes that standard construction techniques will provide a 15-dB reduction of exterior noise levels to an interior receiver. With these criteria, standard construction could be assumed to result in interior noise levels of 45 CNEL or less when exterior sources are 60 CNEL or less. When exterior noise levels are greater than 60 CNEL, consideration of specific construction techniques is required.

c. On-Site Generated Noise

On-site generated noise is regulated by the City’s Noise Ordinance. Noise levels would be considered significant if projected on-site generated noise levels would exceed the applicable limits specified in the Noise Ordinance. These limits are summarized in Table 4.8-1 below.
4.0 Environmental Analysis

4.8 Noise

### TABLE 4.8-1
APPLICABLE NOISE ORDINANCE LIMITS

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Time of Day</th>
<th>One-Hour Average Sound Level [dB(A) L_{eq}]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single Family Residential</td>
<td>7:00 a.m. to 7:00 p.m.</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>7:00 p.m. to 10:00 p.m.</td>
<td>45</td>
</tr>
<tr>
<td></td>
<td>10:00 p.m. to 7:00 a.m.</td>
<td>40</td>
</tr>
<tr>
<td>Multi-Family Residential (up to a max. density of 1/2000)</td>
<td>7:00 a.m. to 7:00 p.m.</td>
<td>55</td>
</tr>
<tr>
<td></td>
<td>7:00 p.m. to 10:00 p.m.</td>
<td>50</td>
</tr>
<tr>
<td></td>
<td>10:00 p.m. to 7:00 a.m.</td>
<td>45</td>
</tr>
<tr>
<td>All other Residential</td>
<td>7:00 a.m. to 7:00 p.m.</td>
<td>60</td>
</tr>
<tr>
<td></td>
<td>7:00 p.m. to 10:00 p.m.</td>
<td>55</td>
</tr>
<tr>
<td></td>
<td>10:00 p.m. to 7:00 a.m.</td>
<td>50</td>
</tr>
<tr>
<td>Commercial</td>
<td>7:00 a.m. to 7:00 p.m.</td>
<td>65</td>
</tr>
<tr>
<td></td>
<td>7:00 p.m. to 10:00 p.m.</td>
<td>60</td>
</tr>
<tr>
<td></td>
<td>10:00 p.m. to 7:00 a.m.</td>
<td>60</td>
</tr>
<tr>
<td>Industrial or Agricultural</td>
<td>7:00 a.m. to 7:00 p.m.</td>
<td>75</td>
</tr>
<tr>
<td></td>
<td>7:00 p.m. to 10:00 p.m.</td>
<td>75</td>
</tr>
<tr>
<td></td>
<td>10:00 p.m. to 7:00 a.m.</td>
<td>75</td>
</tr>
</tbody>
</table>

### d. Construction Noise

Construction noise is regulated by the City’s Municipal Code. Section 59.5.0404 of the Municipal Code, the City’s Noise Abatement and Control Ordinance, states that:

- It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington’s Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise.

- . . . it shall be unlawful for any person, including the City, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.

### 4.8.1.2 Existing Ambient Noise

Ambient noise levels at the project site are primarily due to traffic on La Jolla Village Drive, La Jolla Scenic Way, and Torrey Pines Road. Three measurements were made at the project site. Figure 4.8-1 shows the locations of these measurements.

Measurement 1 was located on the project site adjacent to La Jolla Village Drive. During the measurement period, traffic on La Jolla Village Drive was affected by the traffic lights located at the intersection of La Jolla Village Drive and Torrey Pines Road and the intersection of La Jolla Village Drive and La Jolla Scenic Way. The posted speed on La Jolla Village Drive is 40 miles per hour. However, during the measurement period, the average observed traffic speed was
30 miles per hour past the project site. This is because of the heavy traffic volumes and the close proximity of several busy intersections with traffic lights. Noise levels were measured for 15 minutes, and traffic on La Jolla Village Drive was counted during the interval. Traffic on La Jolla Village Drive was the dominant noise source. The average measured noise level was 67.4 dB(A) $L_{eq}$ at Measurement Location 1.

Measurement 2 was located just south of the project site adjacent to Torrey Pines Road. Traffic on Torrey Pines Road and La Jolla Village Drive were the dominant noise sources. Noise levels were measured for 15 minutes, and traffic on Torrey Pines Road was counted during the interval. The average measured noise level was 70.9 dB(A) $L_{eq}$ at Measurement Location 2.

Measurement 3 was located on the project site adjacent to the intersection of La Jolla Scenic Way and La Jolla Scenic Drive North. Traffic on La Jolla Scenic Way and traffic on La Jolla Village Drive were the dominant noise sources. Noise levels were measured for 15 minutes, and traffic on La Jolla Scenic Way was counted during the interval. The average measured noise level was 61.2 dB(A) $L_{eq}$ at Measurement Location 3.

### 4.8.2 Significance Determination Thresholds

Based on the City’s 2011 Significance Determination Thresholds, impacts related to noise would be significant if the project would:

- Result in or create a significant increase in the existing ambient noise levels;
- Expose people to noise levels which exceed the City’s adopted noise ordinance; and/or
- Result in the exposure of people to current or future transportation noise levels, which exceed standards established in the General Plan or an adopted ALUCP.

According to the City’s Significance Determination Thresholds, the following criteria are used to determine a potential threshold at which noise levels would be considered significant under CEQA:

#### 4.8.2.1 Traffic Noise

- **Exterior noise** levels would be considered significant if projected traffic would result in noise levels exceeding 65 CNEL at exterior usable areas. (City of San Diego General Plan, 2008, Table NE-3 Land Use-Noise Compatibility Guidelines).

- **Interior noise** levels would be considered significant if interior noise levels would exceed 45 CNEL (City of San Diego General Plan, 2008, Table NE-3 Land Use-Noise Compatibility Guidelines).
4.8.2.2 On-Site Stationary Noise

- Noise levels would be considered significant if projected on-site generated noise levels would exceed the applicable limits specified in the Noise Ordinance. These limits are summarized in Table 4.8-1 above.

4.8.2.3 Construction Noise

- Pursuant to the City’s Noise Ordinance, temporary construction noise that exceeds 75 dB(A) L_{eq} at a sensitive receptor would be considered significant.

4.8.3 Issues 1 and 2: Ambient Noise Level Increase

Would the project result in or create a significant increase in the existing ambient noise levels? Would the project expose people to noise levels which exceed the City’s adopted noise ordinance?

4.8.3.1 Impacts

a. Phase 1/Phase 2

On-Site Generated Noise

Phase 1/Phase 2 would accommodate additional programs and activities in that would occupy both indoor and outdoor gathering areas. On-site noise sources would be those associated with typical student activities at the courtyard and patios. These activities would typically consist of conversations, meetings, and general social gatherings, and are not anticipated to exceed the applicable noise ordinance standards. In addition, as discussed in Section 4.8.1.2, Existing Ambient Noise, measured noise levels due to traffic on surrounding roadways exceed 60 dB(A) L_{eq} and are as high as 70 dB(A) L_{eq}. Noise due to student on-site activities would not be significant when compared to existing and future traffic noise levels.

On rare occasions, the facility would have larger gatherings. Based on information provided by the applicant, as detailed in Section 3.4.2.1(a), general daily attendance is not anticipated to exceed 100 visitors. Overall, allowable occupancy pursuant to the Building Code would be limited to 170, with an additional 50 people within the outdoor courtyard. It is expected that with the proposed facility, a typical Hillel program would draw between 10 and, at most, 50 students to the site. A normal speaking voice has a sound power level of 65 dB. This is approximately equal to a sound pressure level of 56 dB(A) L_{eq} at 3 feet. Assuming all 50 students were congregated outdoors and speaking at the same time, it was calculated that the noise level would be 73 dB(A) L_{eq} at 3 feet. The center of this noise source would be the center of the proposed courtyard. A noise level of 73 dB(A) L_{eq} at 3 feet would attenuate to 43.4 dB(A) L_{eq} at the closest adjacent residential receiver 90 feet away. This is less than the daytime and evening noise ordinance limits of 50 and 45 dB(A) L_{eq}, respectively, for single-family residential uses.
The project would be required to comply with the City’s Noise Ordinance; thus, the facility would not operate past 10:00 p.m.

The proposed buildings would require HVAC for heating and cooling. Mechanical equipment wells would be located on the roof of each of the three buildings. The equipment wells would be shielded by a 3.5-foot parapet wall on top of the roofs. It is not known at this time which manufacturer, brand, or model of unit or units will be selected for use in the project. With a capacity of 1 ton required for 1,000 square feet of building space, it was conservatively calculated that a 5-ton unit would be required for each of the three buildings.

Based on review of various manufacturer specifications for example units, a representative noise level for a 5-ton unit would be a sound power level of 82 dB. This is approximately equal to a sound pressure level of 73 dB(A) Leq at 3 feet. For a 5-ton unit, the representative noise level of 73 dB(A) Leq at 3 feet was used for this analysis. Noise levels were modeled for a series of 9 receivers located at the adjacent residential properties. Receiver and source locations are shown in Figure 4.8-2. A sound level of 73 dB(A) Leq at 3 feet was chosen as a representative noise level for each 5-ton unit.

Noise levels at the property lines due to the HVAC units were calculated, as described in the Noise Technical Report (Appendix G). The noise level of 73 dB(A) Leq at 3 feet for the units on each proposed building was adjusted for the distance and height from the proposed HVAC units to the adjacent residential property lines. Noise reduction provided by the parapet walls were determined first by calculating the Fresnel number and then converting this to an insertion loss. Table 4.8-2 summarizes the HVAC noise levels at each receiver. As shown, HVAC noise levels are not projected to exceed 40 dB(A) Leq at the adjacent residential properties.

<table>
<thead>
<tr>
<th>Receiver</th>
<th>HVAC 1 Noise Level</th>
<th>HVAC 2 Noise Level</th>
<th>HVAC 3 Noise Level</th>
<th>Total Noise Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>25</td>
<td>25</td>
<td>23</td>
<td>29</td>
</tr>
<tr>
<td>2</td>
<td>28</td>
<td>29</td>
<td>28</td>
<td>33</td>
</tr>
<tr>
<td>3</td>
<td>27</td>
<td>29</td>
<td>32</td>
<td>35</td>
</tr>
<tr>
<td>4</td>
<td>25</td>
<td>27</td>
<td>31</td>
<td>33</td>
</tr>
<tr>
<td>5</td>
<td>22</td>
<td>24</td>
<td>27</td>
<td>29</td>
</tr>
<tr>
<td>6</td>
<td>21</td>
<td>23</td>
<td>24</td>
<td>28</td>
</tr>
<tr>
<td>7</td>
<td>21</td>
<td>23</td>
<td>25</td>
<td>28</td>
</tr>
<tr>
<td>8</td>
<td>22</td>
<td>25</td>
<td>25</td>
<td>29</td>
</tr>
<tr>
<td>9</td>
<td>22</td>
<td>25</td>
<td>25</td>
<td>29</td>
</tr>
</tbody>
</table>

Overall, on-site noise would be within allowable limits and impacts would be less than significant.
**Noise Associated with Special Events**

Throughout the year special events would occur at the facility. On these limited occasions, attendance at the HCJL could be greater than the daily expectation of 100 people. Specifically, up to eight times a year, occupancy could be between 100 to 150 people, and up to four times a year occupancy could be greater than 150. However, occupancy of the facility would never be allowed to exceed the maximum listed above. Therefore, the analysis of noise impacts would be the same for these special events and impacts would be less than significant.

**Construction Noise**

Noise associated with the earthwork, excavation, construction, and surface preparation for Phase 2 would result in short-term impacts to adjacent residential properties. A variety of noise-generating equipment would be used during the construction phase of the project, such as scrapers, dump trucks, backhoes, front-end loaders, jackhammers, and concrete mixers, along with others.

Construction activities would include the recompaction and export of 4,000 cubic yards of soil, excavation for footings and utilities, fine site grading, deliveries, and building construction. The loudest noise levels would occur during grading operations. Table 4.8-3 summarizes the equipment that would be required during grading operations, the maximum noise levels, the usage factors, and the average hourly noise level produced by each piece of equipment. The usage factor is the percentage of time that the equipment would produce the maximum noise level at full power.

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Maximum Noise Level at 50 Feet [dB(A) (L_{eq})]</th>
<th>Usage Factor</th>
<th>Average Hourly Noise Level at 50 Feet [dB(A) (L_{eq(1)})]</th>
<th>Average Hourly Noise Level at 100 Feet [dB(A) (L_{eq(1)})]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dozer</td>
<td>81.7</td>
<td>40%</td>
<td>77.7</td>
<td>73.7</td>
</tr>
<tr>
<td>Loader</td>
<td>79.1</td>
<td>40%</td>
<td>75.1</td>
<td>69.1</td>
</tr>
<tr>
<td>Water Truck</td>
<td>76.5</td>
<td>40%</td>
<td>72.5</td>
<td>66.5</td>
</tr>
<tr>
<td>Dump Truck</td>
<td>76.5</td>
<td>40%</td>
<td>72.5</td>
<td>66.5</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>79.8</strong></td>
<td></td>
<td><strong>73.8</strong></td>
<td><strong>73.8</strong></td>
</tr>
</tbody>
</table>

\(^1\text{SOURCE: Kovtun pers.com. 2010}\)
\(^2\text{SOURCE: FHWA 2006}\)

For a worst-case analysis, it was assumed that all the equipment listed in Table 4.8-3 would operate simultaneously. As shown, the worst-case average hourly noise level at 100 feet would be 73.8 dB(A) \(L_{eq(1)}\).

Grading would occur over the entire site and would not be situated at any one location for a long period. Therefore, the acoustic center of the construction activity was assumed to be the center of the vacant site. Neighboring uses are more than 100 feet from the center of the vacant site.
Therefore, construction noise levels are projected to be within City standards and impacts would be less than significant.

**Ground-Borne Vibration/Noise**

Phase 1/Phase 2 does not propose any uses that would generate ground-borne vibration or noise. Construction would not require pile driving. Ground-borne vibration impacts would be less than significant.

**b. Existing with Improvements Option**

**On-site Generated Noise**

Noise related to on-site uses for the Existing with Improvements option would be consistent with existing measured noise levels, and therefore would not be significant when compared to existing and future traffic noise levels.

**Construction Noise**

Noise associated with the minor grading for the new surface parking lot and new driveway connecting to the existing cul-de-sac for the Existing with Improvements option would not be of a duration or level that would exceed City standards. Impacts would be less than significant.

**Ground-Borne Vibration/Noise**

This option would not generate ground-borne vibration or noise. Ground-borne vibration impacts would be less than significant.

**4.8.3.2 Significance of Impacts**

**a. Phase 1/Phase 2**

On-site noise due to outdoor activities and HVAC units would not exceed the applicable noise ordinance limits. In addition, construction noise levels are projected to be within City standards. Phase 1/Phase 2 would be required to comply with City noise standards. There would be no sources of ground-borne vibration or noise. Noise generated from construction and operation of Phase 1/Phase 2 would result in less than significant noise impacts.

**b. Existing with Improvements Option**

Noise related to on-site uses for the Existing with Improvements option would be consistent with existing measured noise levels. Noise associated with the minor grading would not exceed City standards. The Existing with Improvements option would be required to comply with City noise standards. There would be no sources of ground-borne vibration or noise. Noise impacts associated with the Existing with Improvements option would be less than significant.
4.8.3.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.

4.8.4 Issue 3: Traffic Noise

Would the project result in the exposure of people to current or future transportation noise levels, which exceed standards established in the General Plan or an adopted ALUCP?

4.8.4.1 Impacts

a. Phase 1/Phase 2

Exterior Noise

Noise generated by future traffic from Phase 1/Phase 2 was modeled using the Federal Highway Administration (FHWA) Traffic Noise Model Version 2.5. The Traffic Noise Model program calculates noise levels at selected receiver locations using input parameter estimates such as projected hourly average traffic rates; vehicle mix, distribution, and speed; roadway lengths and gradients; distances between sources, barriers, and receivers; and shielding provided by intervening terrain, barriers, and structures.

Future (Year 2030) traffic volumes on La Jolla Village Drive, La Jolla Scenic Way, and Torrey Pines Road in the project vicinity were obtained from the traffic report (Appendix B). Noise levels were modeled for a series of 75 ground-floor receivers located throughout the vacant site associated with Phase 2 to determine the future noise contours over the site due to traffic on the area roadways.

The resulting noise contours at 5 feet above the ground are shown in Figure 4.8-3. These noise contours include the effects of future grading on the vacant site and the effects of the existing wall and residences on Torrey Pines Road, but do not take into account any shielding provided by the buildings. “Pavement” ground conditions were used in modeling noise levels at these receivers to account for the future site condition. As seen from Figure 4.8-3, future traffic noise levels are projected to exceed 65 CNEL across the vacant site associated with Phase 2. Noise levels are projected to exceed 70 CNEL on the northern half of the site adjacent to La Jolla Village Drive.

Noise levels were also modeled for six receivers located at the courtyard, the second floor patio, and the northern entryway, as shown in Figure 4.8-4. Noise levels were modeled at first-floor
receivers 1 through 5, five feet above ground level; and at the second-floor receiver 6, five feet above the elevation of the patio. Receivers 1–4 and Receiver 6 are located at the exterior usable areas to determine compliance with the 65 CNEL exterior noise standard. Receiver 5 is located at the northern entry to the courtyard and does not represent exterior usable space. Noise levels were modeled at this location to determine the need for an interior noise analysis. Noise levels at these locations include the effects of topography and shielding provided by the buildings associated with Phase 2.

Table 4.8-4 indicates the projected future noise levels at the six modeled receivers. As seen from this table, the noise levels are not projected to exceed 65 CNEL at the exterior usable areas.

<table>
<thead>
<tr>
<th>Receiver</th>
<th>Location</th>
<th>Projected Noise Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Ground Floor Courtyard</td>
<td>56</td>
</tr>
<tr>
<td>2</td>
<td>Ground Floor Courtyard</td>
<td>60</td>
</tr>
<tr>
<td>3</td>
<td>Ground Floor Courtyard</td>
<td>59</td>
</tr>
<tr>
<td>4</td>
<td>Ground Floor Courtyard</td>
<td>63</td>
</tr>
<tr>
<td>5</td>
<td>Northern Entry to Courtyard*</td>
<td>68</td>
</tr>
<tr>
<td>6</td>
<td>Second Floor Patio</td>
<td>61</td>
</tr>
</tbody>
</table>

*Not exterior usable space

**Interior Noise**

As discussed above, noise-sensitive interior spaces have an interior standard of 45 CNEL. The City conservatively assumes that standard construction materials will provide a 15-dB reduction of exterior noise levels to an interior receiver. With these criteria, standard construction could be assumed to result in interior noise levels of 45 CNEL or less when exterior sources are 60 CNEL or less. As shown in Table 4.8-4, exterior noise levels are projected to exceed 60 CNEL; hence, interior noise levels could exceed 45 CNEL, resulting in a significant impact.

**b. Existing with Improvements Option**

**Exterior Noise**

As discussed in Chapter 3.0, Project Description, a paved parking lot would be constructed where the garage and patio are currently located; thus, there would be no exterior use areas under the Existing with Improvements option. Therefore, this option would not result in the exposure of people to current or future traffic noise. Conformance to existing standards would be met, and no impact would result.
**Interior Noise**

As shown in Figure 4.8-3, the 70 CNEl noise contour extends to the immediate north of the Cliffridge property, running parallel with La Jolla Village Drive. As discussed above, the existing barrier on Torrey Pines Road, as well as the house south of Cliffridge property, were modeled in order to determine the future noise levels. The noise levels exceed 65 CNEl on the Cliffridge property site. Noise sensitive interior spaces have an interior standard of 45 CNEl. The City conservatively assumes that standard construction materials will provide a 15-dB reduction of exterior noise levels to an interior receiver. With these criteria, it can be assumed to that the Cliffridge property would have interior noise levels of 50 CNEl; hence, interior noise levels could exceed 45 CNEl, resulting in a significant impact.

**4.8.4.2 Significance of Impacts**

a. **Phase 1/Phase 2**

**Exterior Noise**

As shown in Table 4.8-4, exterior noise levels at the exterior usable areas are projected to be less than the threshold of 65 CNEl at the exterior usable areas. Exterior noise impacts would be less than significant.

**Interior Noise**

As shown in Table 4.8-4, exterior noise levels are projected to exceed 60 CNEl; hence, interior noise levels could exceed 45 CNEl. Interior noise impacts are potentially significant.

b. **Existing with Improvements Option**

**Exterior Noise**

There would be no exterior use areas under the Existing with Improvements option. Conformance to existing standards would be met, and no impact would result.

**Interior Noise**

Exterior noise levels are projected to exceed 60 CNEl; hence, interior noise levels could exceed 45 CNEl. Interior noise impacts are potentially significant.

**4.8.4.3 Mitigation, Monitoring, and Reporting**

a. **Phase 1/Phase 2**

**Exterior Noise**

No mitigation is required.
**Interior Noise**

The following measures would reduce interior noise levels for Phase 2 and shall be a condition of project approval.

**NOS-1**  At the time that building plans are available for the buildings associated with Phase 2, and prior to the issuance of building permits, a detailed acoustical analysis shall demonstrate that interior noise levels due to exterior sources would be at or below the 45 CNEL standard.

Possible interior noise attenuation measures include using construction materials with greater noise reduction properties. The exterior to interior noise reduction provided by the building structure is partially a function of the sound transmission class (STC) values of the window, door, wall, and roof components used in the building. The greater the STC value, generally the greater the noise reduction. The necessary STC values required to reduce interior noise levels to 45 CNEL or less, which may range from STC 25 to STC 35 for window and door components and STC 42 to STC 46 for exterior wall and roof components, would be determined as a part of the required interior noise analysis. The applicant’s final building plans shall identify all recommendations of the acoustical report, including STC ratings of windows and doors, ventilation requirements, insulation, plumbing isolation, etc. Final building plans shall be reviewed by the City’s Acoustical Plan Checker to verify that the mitigation measures recommended in the acoustical report have been incorporated.

**NOS-2**  The design for the buildings shall include a ventilation or air conditioning system to provide a habitable interior environment when windows are closed.

**Existing with Improvements Option**

**Exterior Noise**

No mitigation is required.

**Interior Noise**

**NOS-3**  Prior to the issuance of building permits, a detailed acoustical analysis shall demonstrate that interior noise levels within the Cliffridge property due to exterior sources would be at or below the 45 CNEL standard.

Possible interior noise attenuation measures include using windows and doors with greater noise reduction properties, installing insulation, or isolating plumbing components. The exterior to interior noise reduction provided by the building structure is partially a function of the STC values of the windows and doors used in the building. The greater the STC value, generally the greater the noise reduction.
The necessary STC values required to reduce interior noise levels to 45 CNEL or less, which may range from STC 25 to STC 35 for window and door components, would be determined as a part of the required interior noise analysis. The applicant’s final building plans shall identify all recommendations of the acoustical report, including STC ratings of windows and doors, ventilation requirements, insulation, plumbing isolation, etc. Final building plans shall be reviewed by the City’s Acoustical Plan Checker to verify that the mitigation measures recommended in the acoustical report have been incorporated.

NOS-4 The design for the buildings shall include a ventilation or air conditioning system to provide a habitable interior environment when windows are closed.

4.8.4.4 Significance of Impacts After Mitigation

a. Phase 1/Phase 2

*Interior Noise*

Implementation of the mitigation measures identified above would ensure that interior noise levels would not exceed the 45 CNEL standard. Impacts would be mitigated to a level that is less than significant.

b. Existing with Improvements

*Interior Noise*

Implementation of the mitigation measures identified above would ensure that interior noise levels would not exceed the 45 CNEL standard. Impacts would be mitigated to a level that is less than significant.
FIGURE 4.8-3
Future Traffic Noise Contours

[Image: An aerial view of a map showing project boundaries, noise contours, and property locations.]

- Project Boundary
- Noise Contour
- Project Lines
- 70 CNEL

Image source: Copyright 2010 GlobeXplorer, All Rights Reserved (flown March 2010)
4.9 Paleontological Resources

The following section provides background information on existing paleontological resources within the project area. This analysis is based on a review of available literature, including the City’s General Plan, the geotechnical reconnaissance (see Appendix D), Kennedy maps, the City’s Paleontological Guidelines, and the County of San Diego Paleontological Resources by Deméré and Walsh (1994).

4.9.1 Existing Conditions

4.9.1.1 Paleontological Resource Potential

Paleontological resources (fossils) are the remains and/or traces of prehistoric animal and plant life exclusive of human remains or artifacts. Fossil remains such as bones, teeth, shells, leaves, and other fossils are found in the geologic deposits (rock formations) within which they were originally buried. Fossil remains are important as they provide indicators of the earth’s chronology and history. They represent a limited, nonrenewable, and sensitive scientific and educational resource.

The potential for fossil remains at a given location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are entombed. Geologic formations possess a specific paleontological resource potential wherever the formation occurs based on discoveries made elsewhere in that particular formation. To evaluate paleontological resources, the presence and distribution of geologic formations and the respective potential for paleontological resources were reviewed.

Geologic formations are rated for paleontological resource potential according to the following scale (Deméré and Walsh 1994).

- **High Sensitivity** - these formations contain a large number of known fossil localities. Generally, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.

- **Moderate Sensitivity** - these formations have a moderate number of known fossil localities. Generally, moderately sensitive formations produce invertebrate fossil remains in high abundance or vertebrate fossil remains in low abundance.

- **Low and/or Unknown Sensitivity** - these formations contain only a small number of known fossil localities and typically produce invertebrate fossil remains in low abundance. Unknown sensitivity is assigned to formations from which there are presently no known paleontological resources, but which have the potential for producing such remains based on their sedimentary origin.
Very Low Sensitivity - very low sensitivity is assigned to geologic formations that, based on their relative youthful age and/or high-energy depositional history, are judged to be unlikely to produce any fossil remains.

As discussed in the Geology and Soils section of this EIR (Section 4.4), the project area is underlain by sediments of the Quaternary-age Lindavista Formation and Tertiary-age Scripps Formation. Current regional geologic mapping indicates on-site surface deposits to be very old paralic deposits (Qvop 10 and Qvop 10a) that were previously included in the Lindavista Formation and the Scripps Formation (refer to Figure 4.4-1). The very old paralic deposits in the project area are considered to have a moderate sensitivity level and the Scripps Formation is considered to have a high sensitivity potential for paleontological resources.

4.9.1.2 Regulatory Framework

Pursuant to Section 15065 of the State CEQA Guidelines (California Code of Regulations Sections 15000–15387), a lead agency must find that a project would have a significant effect on the environment where the project has the potential to eliminate important examples of the major periods of California prehistory, which includes the destruction of significant paleontological resources.

In addition, paleontological resources are protected under the Heritage Resources Element of the La Jolla Community Plan, which includes a policy “to ensure that sensitive paleontological resources in La Jolla are preserved through the recovery of significant fossils identified during the environmental review process.”

4.9.2 Significance Determination Thresholds

Based on the City’s 2011 Significance Determination Thresholds, impacts related to paleontological resources would be significant if the project would:

- Require over 1,000 cubic yards of excavation at a depth of 10 feet or greater in a high resource potential formation that would result in the loss of significant paleontological resources.

- Require over 2,000 cubic yards of excavation at a depth of 10 feet or greater in a moderate resource potential geologic formation that would result in the loss of significant paleontological resources.

4.9.3 Issue 1: Paleontological Resources

Would the project require over 1,000 cubic yards of excavation at a depth of 10 feet or greater in a high resource potential geologic formation or require over 2,000 cubic yards of excavation at a depth of 10 feet or greater in a moderate resource potential geologic formation?
4.9.3.1 Impacts

a. Phase 1/Phase 2

Our understanding of history is obtained, in part, through the discovery and analysis of paleontological resources. Fossils are buried in sedimentary rock layers and they are vulnerable to destructive processes of both natural weathering and erosion, as well as manmade earthmoving operations. Such activities could expose and unearth fossil remains, which could destroy paleontological resources if the fossils are not recovered and salvaged. Construction activities would therefore be significant if they involve excavation or grading of geologic formations that could contain fossil remains.

The project site is underlain by the Lindavista Formation (broadly correlative with very old paralic deposits), which has moderate sensitivity potential for paleontological resources, and the Scripps Formation, which has a high sensitivity potential for paleontological resources.

<table>
<thead>
<tr>
<th>Geological Deposit/Formation/Rock Unit</th>
<th>Potential Fossil Localities</th>
<th>Sensitivity Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lindavista Formation (Qln, Qlb)¹</td>
<td>A. Mira Mesa/Tierrasanta</td>
<td>A. High</td>
</tr>
<tr>
<td></td>
<td>B. All other areas</td>
<td>B. Moderate</td>
</tr>
<tr>
<td>Scripps Formation</td>
<td>All communities where this unit occurs</td>
<td>High</td>
</tr>
</tbody>
</table>

SOURCE: City of San Diego CEQA Significance Determination Thresholds, January 2011.
¹Broadly correlative with Qvop 1-13 (very old paralic deposits) of Kennedy and Tan (2008) new mapping nomenclature.

Phase 1/Phase 2 grading would involve 3,150 cubic yards of soil at depths of 10 feet or more, which exceeds the thresholds for high and moderate sensitivity areas. Therefore, impacts resulting from construction of Phase 1/Phase 2 would be significant.

b. Existing with Improvements Option

As the Existing with Improvements option would not involve grading exceeding the 1,000- and 2,000-cubic-yard thresholds for high and moderate paleontological sensitivity areas respectively, impacts would be less than significant.

4.9.3.2 Significance of Impacts

a. Phase 1/Phase 2

Because of the amount of grading in both the moderate and high sensitivity potential areas for paleontological resources, project grading could potentially destroy fossil remains, resulting in a significant impact to paleontological resources.
b. Existing with Improvements Option

The Existing with Improvements option would not involve grading that exceeds the thresholds for high and moderate paleontological sensitivity areas. Impacts would be less than significant.

4.9.3.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

Significant impacts to paleontological resources are most often mitigated by the implementation of a monitoring program. The monitoring program would be carried out under the supervision of a qualified paleontologist and includes attendance at preconstruction meetings as well as on-site inspections of active excavations.

PALEO-1 The procedures outlined below shall be a condition of approval for Phase 1/Phase 2.

I. Prior to Permit Issuance

A. Entitlements Plan Check

1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD ED shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

B. Letters of Qualification have been submitted to ADD ED

1. The applicant shall submit a letter of verification to MMC identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines.

2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.

3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.
II. Prior to Start of Construction

A. Verification of Records Search

1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the CM and/or Grading Contractor.

   a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM, or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

   a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored, including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).

3. When Monitoring Will Occur

   a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.

   b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of
excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, Occupational Safety and Health Administration safety requirements may necessitate modification of the PME.

2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition, such as trenching activities, does not encounter formations soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.

3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or e-mail with photos of the resource in context, if possible.
C. Determination of Significance

1. The PI shall evaluate the significance of the resource.

   a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.

   b. If the resource is significant, the PI shall submit a Paleontological Recovery Program and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.

   c. If the resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils), the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.

   d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract:

1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Preconstruction Meeting.

2. The following procedures shall be followed.

   a. No Discoveries

      In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8 A.M. on the next business day.

   b. Discoveries

      All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.
c. Potentially Significant Discoveries

If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.

d. The PI shall immediately contact MMC, or by 8 A.M. on the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night work becomes necessary during the course of construction:

1. The CM shall notify the RE, or BI as appropriate, a minimum of 24 hours before the work is to begin.

2. The RE or BI, as appropriate, shall notify MMC immediately.

C. All other procedures described above shall apply, as appropriate.

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.

a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.

b. Recording Sites with the San Diego Natural History Museum

The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
4. PCM shall provide written verification to the PI of the approved report.

5. PCM shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.

2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.

C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification

1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.

2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and PCM.

D. Final Monitoring Report(s)

1. The PI shall submit two copies of the Final Monitoring Report to PCM (even if negative) within 90 days after notification from PCM that the Draft Monitoring Report has been approved.

2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from PCM which includes the Acceptance Verification from the curation institution.

b. Existing with Improvements Option

No mitigation would be required.

4.9.3.4 Significance After Mitigation

a. Phase 1/Phase 2

Implementation of the mitigation measure described above would reduce impacts to paleontological resources to below a level of significance.
4.10 Hydrology/Drainage

The following hydrology analysis is based upon updated studies since the December 2013 public review of this EIR. on the water quality technical report and hydrology study for the project. The Drainage Study (Atlas Civil Design) was revised to evaluate the project's compliance with new City water management regulations (Atlas Civil Design 2016). (Paul Design Group 2011a, 2011b). This new technical report updates and replaces the circulated study as is included as Appendix H and Appendix I of this Final EIR. The study analyzes the existing and post-developed rate of runoff generated within the limits of the project site for purposes of determining the net impact to the existing downstream storm drain system. This section has been updated to reflect the content of the new report. As detailed below, no new significant impacts would occur as a result of the changes to City regulations.

4.10.1 Existing Conditions

4.10.1.1 Receiving Waters

The project site is located within the Los Peñasquitos Hydrologic Unit (HU 906.10 to 906.50), as defined by the Water Quality Control Plan for the San Diego Basin (RWQCB 1994). The Los Peñasquitos Hydrologic Unit covers a total land area of approximately 100 square miles including portions of the cities of San Diego, Poway, and Del Mar. Major water bodies within this hydrologic unit include the Los Peñasquitos Creek, Los Peñasquitos Lagoon, Rose Creek, Tecolote Creek, Mission Bay, and Miramar Reservoir. The project site is located within both the Scripps Hydrologic Sub Area (HSA 906.30) and Miramar HSA (906.40). The project site is located 0.61 mile from the Pacific Ocean, and 0.60 mile from an unnamed tributary to Rose Creek.

4.10.1.2 Drainage Patterns

The project site is composed of three drainage basins that allow positive runoff from all areas of the site (Figure 4.10-1). The largest of the three basins, Basin 100, is composed of the building site, parking area (permeable paving) and the associated landscaping planters areas. The flow from Basin 100 enters an existing 18-inch storm drain pipe, allows surface runoff to enter the public drainage system at the existing inlet west of the intersection of La Jolla Scenic Way and La Jolla Scenic Drive North, which is connected to an 18-inch storm drain line and flows along La Jolla Village Drive. Basin 200 consists of the flow from the public right-of-way along La Jolla Village Drive and La Jolla Scenic Way, surface runoff enters the gutter line and flows along La Jolla Village Drive. Basin 300 is primarily landscaping, driveway area, and a public bike path, surface runoff flows back into the end of the La Jolla Scenic Drive North cul-de-sac, where it enters into a ditch to be taken to the Torrey Pines Road gutter line.
4.10.1.3 Flood Hazards

The project site lies within Federal Emergency Management Agency flood insurance rate map 06073C1601F, Zone X. This is designated as being outside the 500-year floodplain.

4.10.1.4 Regulatory Framework

a. Local Drainage Design Manual

Chapter 14, Article 2, Division 2 of the San Diego Municipal Code outlines Storm Water Runoff and Drainage Regulations which apply to all development in the City, regardless of whether or not a development permit or other approval is required. In addition, drainage design policies and procedures are provided in the City's Drainage Design Manual (which is incorporated in the Land Development Manual as Appendix B). The Drainage Design Manual provides a guide for designing drainage, and drainage-related facilities for developments within the City.

4.10.2 Significance Determination Thresholds

Based on the City’s Significance Determination Thresholds, impacts related to hydrology and drainage would be significant if the project would:

- Result in a substantial increase in impervious surfaces and associated increased runoff?
- Result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

4.10.3 Issues 1 and 2: Surface Runoff and Drainage Patterns

Would the project result in a substantial increase in impervious surfaces and associated increased runoff?

a. Phase 1/Phase 2

Construction of three individual buildings and a parking lot would increase the total impervious surface of the project site. After construction, pre-development flow rate of storm water runoff would increase by 0.58 cubic feet per second [cfs] (Basin 100) in the 100-year storm event. However, the increased flow rate would be reduced by on-site underground detention facilities. Tables 4.10-1 and 4.10-2 provide a summary of the pre- and post-development areas and 100-year peak flows with and without the detention facilities.

an increase in the amount of impervious surfaces on the existing vacant site; however, the project proposes the installation of permeable pavers along with planters around the parking lot to reduce runoff from the impervious surfaces. In addition, existing hardscaping in the cul-de-sac would be removed and replaced with landscaping and a pedestrian path.
Phase 1/Phase 2 would focus on low-impact design (LID) principles through implementation of integrated management practices (IMPs) for post-construction storm water management. Implementation of IMPs would include a small-scale treatment, retention, or detention facility integrated into the site layout, landscaping, and drainage design. LID IMPs would collectively minimize directly connected impervious areas and promote infiltration. Additionally, permeable pavers would be used for the parking lot. Stormwater from roof runoff and other impervious areas would be directed to bioretention basins in the parking lot via drains connected to an underground system discharging to the LID IMPs. Flows would then be directed through a private storm drain system from the LID devices to the 18-inch storm drain within La Jolla Scenic Way.

To compare the flow rates in the pre- and post-project conditions, a hydraulic analysis for the vacant site was performed using the City's Drainage Design Manual (see Tables 4.10-1 and 4.10-2 below). Under existing conditions, flows from Basins 1 and 2 are directed to storm drains in La Jolla Village Drive. Surface runoff from Basin 3 flows to the Torrey Pines Road gutter line. There would be no change to this condition for Phase 1.

As shown in Figure 4.10-2, the vacant site would be divided into four basins (A-D). Basin A would be composed of the building site, parking area (permeable paving), and the associated landscaping planter areas. Basin B would be located south of the building site and surface flows would be directed through landscaping to filter the water and into the existing A-2 inlet through the south side of La Jolla Scenic Drive North. Surface flows from Basin C would be directed through landscaping to filter the water before flowing into the gutter line of La Jolla Village Drive. Basin D surface flows would be filtered by directing flows through the landscaping before exiting into a ditch in the northwest corner of the property that flows into the Torrey Pines Road gutter line. Table 4.10-1 shows the calculated runoff rate without the project. Table 4.10-2 shows the calculated runoff rate with the project.

### TABLE 4.10-1
PRE-PROJECT FLOW

<table>
<thead>
<tr>
<th>Basin</th>
<th>( Q_{\text{in}} ) (cubic feet per second)</th>
<th>Area (acres)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>4.10</td>
<td>0.81</td>
</tr>
<tr>
<td>2</td>
<td>0.53</td>
<td>0.46</td>
</tr>
<tr>
<td>3</td>
<td>0.39</td>
<td>0.15</td>
</tr>
<tr>
<td>TOTAL</td>
<td>2.02</td>
<td>1.42</td>
</tr>
</tbody>
</table>

\( Q = \) stormwater runoff rate (see Appendix H for detailed calculation)

*SOURCE: Paul Design Group 2010a; see Appendix H.*
TABLE 4.10-1
PRE- AND POST-DEVELOPMENT AREAS AND FLOWS (WITHOUT DETENTION)

| Basin/Node | Pre-Development | Post-Development | Pre-Development | Post-Development | +/-  
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>100</td>
<td>0.78</td>
<td>0.95</td>
<td>1.48</td>
<td>2.06</td>
<td>+0.58</td>
</tr>
<tr>
<td>200</td>
<td>0.42</td>
<td>0.68</td>
<td>0.80</td>
<td>0.68</td>
<td>-0.12</td>
</tr>
<tr>
<td>300</td>
<td>0.23</td>
<td>0.17</td>
<td>0.46</td>
<td>0.40</td>
<td>-0.06</td>
</tr>
<tr>
<td>Total</td>
<td>1.43</td>
<td>1.43</td>
<td>2.74</td>
<td>3.14</td>
<td>+0.22</td>
</tr>
</tbody>
</table>

Q = storm water runoff (see Appendix I for detailed calculations)
cfs = cubic feet per second

TABLE 4.10-2
POST-PROJECT FLOW

<table>
<thead>
<tr>
<th>Basin</th>
<th>Q_{100} (cubic feet per second)</th>
<th>Area (acre)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>1.42</td>
<td>0.43</td>
</tr>
<tr>
<td>B</td>
<td>1.16</td>
<td>0.49</td>
</tr>
<tr>
<td>C</td>
<td>0.74</td>
<td>0.35</td>
</tr>
<tr>
<td>D</td>
<td>0.44</td>
<td>0.15</td>
</tr>
<tr>
<td>TOTAL</td>
<td>3.76</td>
<td>1.42</td>
</tr>
</tbody>
</table>

Q = stormwater runoff rate (see Appendix H for detailed calculation)
SOURCE: Paul Design Group 2010a; see Appendix H.

TABLE 4.10-2
PRE- AND POST-DEVELOPMENT AREAS AND FLOWS (WITH DETENTION)

| Basin/Node | Pre-Development | Post-Development | Pre-Development | Post-Development | +/-  
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>100</td>
<td>0.78</td>
<td>0.95</td>
<td>1.48</td>
<td>1.36</td>
<td>-0.12</td>
</tr>
<tr>
<td>200</td>
<td>0.42</td>
<td>0.68</td>
<td>0.80</td>
<td>0.68</td>
<td>-0.12</td>
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<tr>
<td>300</td>
<td>0.23</td>
<td>0.17</td>
<td>0.46</td>
<td>0.40</td>
<td>-0.06</td>
</tr>
<tr>
<td>Total</td>
<td>1.43</td>
<td>1.43</td>
<td>2.74</td>
<td>3.14</td>
<td>-0.30</td>
</tr>
</tbody>
</table>

Q = storm water runoff (see Appendix I for detailed calculations)
cfs = cubic feet per second

Specifically, increased flow rates would be directed to the on-site underground detention facility (Figure 4.10-2). From there it would discharge to the existing storm drain system. The proposed underground 150-foot-long, 48-inch pipe would reduce the flow to mimic pre-development drainage conditions (see Appendix E of the Hydrology Report for detailed calculations). Additionally, increased runoff within Basin 300 would be directed to the smaller bioretention area in the northwest corner of the project site. This too would slow flows to pre-development conditions.
Phase 1/Phase 2 would focus on low-impact design (LID) principles through implementation of integrated management practices (IMPs) for post-construction storm water management. Implementation of IMPs would include a small-scale treatment, retention, or detention facility integrated into the site layout, landscaping, and drainage design. LID IMPs would collectively minimize directly connected impervious areas and promote infiltration. Additionally, permeable pavers would be used for the parking lot. Stormwater from roof runoff and other impervious areas would be directed to bioretention basins in the parking lot via drains connected to an underground system discharging to the LID IMPs. Flows would then be directed through a private storm drain system from the LID devices to the 18-inch storm drain within La Jolla Scenic Way. The tables above represent a worst-case scenario (i.e., a 100-year storm event). In addition, a conservative runoff factor of 1.0 was assumed for the parking lot (see Appendix H), even though permeable paving would be installed. Stormwater runoff from impervious areas, such as the building roofs and courtyard, would be directed to the LID IMPs such as bioretention basins for infiltration.

A flow duration analysis was conducted in order to ensure that the design and sizing of the LID IMPs proposed in Basin A would comply with the City’s hydromodification requirements identified in the Storm Water Standards Manual (2012). The other basins (B–D) within the project site would all have a decrease in the pre-project impervious area; therefore, a flow duration analysis is implicitly not required.

The flow duration analysis comparing pre- and post-project conditions within Basin A was conducted using the San Diego Hydrology Model software developed by Clear Creek Solutions. A detailed summary of the methods and assumptions for the continuous simulation modeling is provided in the Water Quality Technical Report (Appendix H). The model analyzed flows from 10 percent of the two-year storm up to the 10-year storm.

For all flow levels analyzed by the continuous simulation modeling, the post-project condition showed a lower percentage of exceeding than did the pre-project condition. Accordingly, the project meets the Storm Water Standards Manual’s goal of not allowing the post-project discharge rates and durations to deviate above the pre-project rates and duration by more than 10 percent over and more than 10 percent of the length of the flow duration curve. Therefore, Phase 1/Phase 2 would not result in a substantial increase in impervious surfaces and associated runoff. Impacts would be less than significant.

b. Existing with Improvements Option

This option would convert the Cliffridge property and residential structure to permanent office use for Hillel. The existing attached garage and patio would be demolished and an ornamental tree removed. These would be replaced by a new paved surface parking lot and a new driveway connecting to the existing cul-de-sac. The parking lot would be in a location where the garage and deck were once located. Replacement of the garage and deck with the proposed parking lot would not result in a substantial increase in impervious surfaces. Impacts would be less than significant.
4.10.3.2 Significance of Impacts

a. Phase 1/Phase 2

Phase 1/Phase 2 would not result in a substantial increase in impervious surfaces and associated runoff. As shown above with the use of on-site detention areas and underground storage facilities, the project would not result in increased runoff. Impacts would be less than significant.

b. Existing with Improvements Option

The Existing with Improvements option would not result in a substantial increase in impervious surfaces and associated runoff. Impacts would be less than significant.

4.10.3.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.

4.10.4 Issue 2: Drainage Patterns

Would the project result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

4.10.4.1 Impacts

a. Phase 1/Phase 2

As discussed above, the 1.41-acre site would be broken up into four proposed basins (Figure 4.10-2). Basin A is composed of the building site, parking area (anticipated to be pervious paving), and the associated landscaping planter areas. The building site comprises the western portion of this basin and would drain to bioretention basins located around the parking area to the east. The parking area, covering the eastern portion of this basin would also drain to these bioretention basins. From these basins, flows exceeding the treatment volume would be captured by risers and directed via an on-site storm drain to a proposed connection to the existing storm drain running along the southeastern portion of the site.

Basin B is located south of the building; the majority of this basin is made up of La Jolla Scenic Drive (impervious). Additionally, portions of the landscaped areas from the project site make up
this basin, which would surface flow into the existing A-2 inlet on the south side of La Jolla Scenic Drive North. Basin C consists of landscaping from the project site as well as pedestrian corridor improvements (curb and sidewalk) for La Jolla Village Drive and La Jolla Scenic Way, which would drain into the gutter lines of those streets and leave the site as surface flow at the northeastern corner of the project. Basin D is primarily landscaping and would surface flow into an existing sidewalk under-drain at the westernmost edge of the property, ultimately discharging to the Torrey Pines Road gutter line.

Overall, there would not be a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes (see Figures 3-15 and 4.10-2). The project would implement minor grading changes to the project site and storm water control measures to capture and infiltrate storm water runoff where pervious areas would be introduced. Impacts associated with drainage patterns would be less than significant.

b. Existing with Improvements Option

The Existing with Improvements option would involve construction of a paved surface parking lot in a location where the garage and deck were once located; thus, there would not be a substantial alteration to on- and off-site drainage patterns. Impacts would be less than significant.

4.10.4.2 Significance of Impacts

a. Phase 1/Phase 2

Phase 1/Phase 2 would not substantially alter on- and off-site drainage patterns due to changes in runoff flow rates or volumes. Therefore, impacts to drainage patterns would be less than significant.

b. Existing with Improvements Option

The Existing with Improvements option would not substantially alter on- and off-site drainage patterns. Impacts would be less than significant.

4.10.4.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.
FIGURE 4.10-2
Post-Development Drainage Map

Map Source: Atlas Civil Design, 2016
4.11 Water Quality

The following water quality analysis is based upon updated studies since the December 2013 public review of this EIR. The Water Quality Technical Report has been replaced with the Storm Water Quality Management Plan (SWQMP) dated January 12, 2017 (Atlas 2017). This new technical report updates and replaces the circulated study as Appendix H of this Final EIR. The SWQMP analyzes the project’s compliance with new City storm water management regulations, including the requirement for managing storm water runoff from land development activities as described in the City’s Storm Water Standards, prepared to meet the requirements of the City (Paul Design Group 2011a). This technical report is included in its entirety as Appendix H of this EIR. This section has been updated to reflect the content of the new report. As detailed below, no new significant impacts would occur as a result of the changes to City regulations.

4.11.1 Existing Conditions

4.11.1.1 Impaired Receiving Waters

As described in Section 4.10.1.1, the project site is located within the Los Peñasquitos Hydrologic Unit (HU 906.10 to 906.50), as defined by the Water Quality Control Plan for the San Diego Basin (RWQCB 1995). The project site is located within both the Scripps HSA (906.30) and Miramar HSA (906.40). As described in Section 4.10.1.1, the project site is located 0.61 mile from the Pacific Ocean, and 0.60 mile from an unnamed tributary to Rose Creek.

Existing beneficial uses of the Pacific Ocean include industrial service supply, navigation, contact and non-contact water recreation, commercial and sport fishing, preservation of biological habitats of special significance, wildlife and rare habitat, rare, threatened, or endangered species, aquaculture, migration of aquatic organisms, spawning, reproduction, and/or early development, and shellfish harvesting (RWQCB 1995). Existing beneficial uses for Rose Creek include contact and non-contact water recreation, warm freshwater habitat, and wildlife habitat (RWQCB 1995).

According to the State Impaired Water Bodies 303(d) List of Water Quality Limited Segments (State Water Resources Control Board [SWRCB] 2010), impairment to water quality in the Scripps HSA is located along the Pacific Ocean Shoreline—at Avenida de la Playa at La Jolla Shores Beach, Children’s Pool, La Jolla Cove, Pacific Beach Point, Pacific Beach, Ravina, and Vallecitos Court at La Jolla Shores Beach. The pollutants causing impairment to the Pacific Ocean Shoreline include total coliform, enterococcus, and fecal coliform. Impairment to water quality in the Miramar HSA is located at Rose Creek. The pollutants causing impairment to Rose Creek include metals/metalloids and toxicity.
4.11.1.2 Existing Pollutant Discharge

Potential sources of the identified pollutants include:

- Urban runoff/storm sewers
- Unknown non-point source
- Unknown point source
- Non-point/point source
- Other urban runoff

The pollutants and/or stressors may or may not be present, but each is a potential impact if the storm water runoff from the site contains similar pollutants of concern. Runoff from the project site ultimately discharges to an Area of Special Biological Significance (ASBS; Area 31). There are 34 ASBS monitored and maintained for water quality by the SWRCB. ASBS cover much of the length of California's coastal waters.

4.11.1.3 Regulatory Framework

Various federal, state, and local regulations impose requirements on new development for erosion control, control of runoff contaminants, and control of direct discharge of water quality pollutants.

a. Federal

The Clean Water Act (33 U.S.C. §1251 et seq.) (1972) is the primary federal law that protects the nation’s waters, including lakes, rivers, aquifers, and coastal areas. The Clean Water Act established basic guidelines for regulating discharges of pollutants into the waters of the U.S. and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the Clean Water Act.

Section 401 of the Clean Water Act requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility which may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources, and Section 404 established a permit program to regulate the discharge of dredged material into Waters of the U.S. In California, the SWRCB and RWQCBs administer the NPDES permitting programs and are responsible for developing waste discharge requirements. The local RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that may apply to projects or recommendations contained within the Plans include the SWRCB Construction General Permit and Industrial General Permit and the regional Municipal Separate Storm Sewer System (MS4) Permit administered by the RWQCB.
b. State


Under the authority of the Clean Water Act amendments and federal NPDES permit regulations, the Water Board issued this order to the Copermittees consisting of San Diego County, the 18 cities within San Diego County, the Port of San Diego, and the San Diego Regional Airport Authority. This order requires that all jurisdictions within the San Diego region prepare Jurisdictional Runoff Management Plans. Each of these jurisdictional plans must contain a component addressing construction activities and a component addressing existing development.

c. Local

Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The basin is composed of 11 major hydrologic units, 54 hydrologic areas, and 147 hydrologic subareas, extending from Laguna Beach southerly to the U.S./Mexico border. Drainage from higher elevations in the east flow to the west, ultimately into the Pacific Ocean. The RWQCB prepared the Basin Plan, which defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

City of San Diego Jurisdictional Runoff Management Program

This document is a total account of how the City of San Diego plans to protect and improve the water quality of rivers, bays, and the ocean in the region in compliance with the Water Board permit referenced above. The document describes how the City incorporates storm water best management practices into land use planning, development review and permitting, City capital improvement program project planning and design, and the execution of construction contracts.

Water Quality Improvement Plans

The MS4 Permit also requires development of Water Quality Improvement Plans (WQIPs) that guide the Copermittees’ jurisdictional runoff management programs towards achieving improved water quality in MS4 discharges and receiving waters. The WQIPs further the Clean Water Act’s objectives to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The requirement sets forth a collaborative and adaptive planning and management process that identifies the highest priority water quality conditions within a
watershed management area and implements strategies through the jurisdictional runoff management programs of the respective jurisdictions.

City of San Diego General Plan

The Conservation Element of the City General Plan includes citywide goals and policies on urban runoff. The Conservation Element policy relevant to the project is included below.

CE-E.2. Apply water quality protection measures to land development projects early in the process—during project design, permitting, construction, and operations—in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of storm water runoff.

City of San Diego Grading Ordinance

Construction of projects in the City is subject to the erosion control requirements of the City's Grading Ordinance. Projects must also comply with the federal and state Clean Water Act. Conformance with the Clean Water Act is established through compliance with the requirements of the NPDES General Permit for the City (Municipal Permit), No. R9-2007-0001.

The NPDES Municipal Permit, issued in 2001 to the City by the San Diego RWQCB, requires the development and implementation, to the maximum extent practicable, of storm water pollution BMPs, both during project construction and in the project's permanent design to reduce discharge of pollutants. To address pollutants that may be generated from new development during and post-construction, the Municipal Permit further requires that the City implement a series of construction and permanent best management practices (BMPs) described in the Model Standard Urban Storm Water Mitigation Plan (SUSMP), which is contained in the Storm Water Standards Manual (City of San Diego 2012). The Storm Water Standards Manual provides information to project applicants on how to comply with all of the City's construction and post-construction permanent storm water BMP requirements, including the SUSMP.

Storm Water Standards Manual

The City's current Storm Water Standards Manual provides information to project applicants on how to comply with the permanent and construction storm water quality requirements in the City. Significant elements of the Storm Water Standards Manual include:

1. Low Impact Develop (LID) Best Management Practice (BMP) Requirements
2. Source Control BMPs
3. BMPs Applicable to Individual Priority Development Project Categories
4. Treatment Control BMPs

Although the footprint of the LID BMPs can often be fit into planned landscaping features, this requires early planning to ensure that the features are located in places where they can
intercept the drainage and safely store the water without adverse effects to adjacent slopes, structures, roadways, or other features. The Storm Water Standards Manual also addresses “Hydromodification – Limitations on Increases of Runoff Discharge Rates and Durations.” Hydromodification management requirements would dictate design elements in locations where downstream channels are susceptible to erosion from increases in storm water runoff discharge rates and durations. Future development projects proposed within areas draining to San Diego Bay would typically be exempt from hydromodification management requirements because of the location and hardened drainage systems. Projects discharging into underground storm drains discharging directly to bays or the ocean are exempt.

The Storm Water Standards Manual also provides minimum requirements for construction site management, inspection, and maintenance of construction BMPs; monitoring of the weather and implementation of emergency plans as needed; and provides minimum performance standards, including: pollution prevention measures so that there would be no measurable increase of pollution (including sediment) in runoff from the site, no slope erosion, water velocity moving off-site must not be greater than pre-construction levels, and preserve natural hydraulic features and riparian buffers where possible. The City’s Storm Water Standards Manual was updated in 2016 for consistency with the Regional Best Management Practices Design Manual.

**Storm Water Requirements Applicability Checklist**

For every project upon formal project submittal, applicants must complete and submit the Storm Water Requirements Applicability Checklist (SWRAC) in order to determine the project’s storm water BMPs required during construction and post-construction. If the project requires treatment control BMPs, per the SWRAC, the applicant must submit a water quality technical report consistent with the City’s Storm Water Standards. The SWRAC was completed for the Phase 1/Phase 2 proposed project and it was determined to be a “Priority Development Project.” Thus, a water quality technical report was prepared and submitted to the City. The report included appropriate BMP selection, BMP maintenance schedules, and the responsible party for future maintenance and associated costs. The report also addressed water quality by describing the type of pollutants that would be generated during construction and post-construction, as well as identifying pollutants captured and treated by the proposed BMPs.

### 4.11.2 Significance Determination Thresholds

Based on the City’s 2011 Significance Determination Thresholds, impacts related to land use would be significant if the project would:

- Result in an increase in pollutant discharge, including downstream sedimentation, to receiving waters during or following construction, including discharge to an already impaired water body.
4.11.3 Issue 1: Pollutant Discharge

Would the project result in pollutant discharge, including downstream sedimentation, to receiving waters during or following construction, including discharge to an already impaired water body?

4.11.3.1 Impacts

As stated in the City’s Significance Determination Thresholds for water quality, compliance with federal, state, and local water quality standards is assured through project adherence to the City’s Storm Water Standards (2012) and related conditions placed on building permits prior to project approval. Development of the proposed project could result in pollutant discharge and increase in pollution levels within impaired water bodies. According to the SWQMP, development of the proposed project could generate the following site pollutants: sediment, nutrients, trash and debris, oxygen demanding substances, oil and grease, and pesticides. However, prior to the issuance of any discretionary permits associated with the project (i.e., construction permits) applicable NPDES permit requirements would require the retention and/or treatment of storm water through the implementation of BMPs. Under current storm water regulations in the City all projects requiring approvals are subject to certain minimum storm water requirements to protect water quality. Types of storm water BMPs required for new developments include source control, site design, and treatment control practices, many of which overlap with LID practices.

a. Source Control BMPs

As detailed in the SWQMP, the project would implement source control BMPs as required by the BMP Design Manual (Part 1 of the City’s Storm Water Standards). Source control BMPs would include:

- Prevention of illicit discharges into the MS4
- Storm drain stenciling or signage
- Protect outdoor materials storage areas from rainfall, run-on, runoff, and wind dispersal
- Protect materials stored in outdoor work areas from rainfall, run-on, runoff, and wind dispersal
- Protect trash storage areas from rainfall, run-on, runoff, and wind dispersal

Additional source control BMPs may be implemented to protect potential sources of pollutants including on-site storm drains, landscaping/pesticide use, food service, and refuse areas.

b. Site Design BMPs

As detailed in the SWQMP, the proposed project would implement Site Design BMPs as required by the BMP Design Manual (Part 1 of the City’s Storm Water Standards). The project would include the following Site Design BMPs:
4.0 Environmental Analysis

4.11 Water Quality

- Maintain natural drainage pathways and hydrologic features
- Conservation of natural areas, soils, and vegetation
- Minimization of impervious areas
- Minimization of soil compaction
- Impervious area dispersion
- Landscaping with native or drought tolerant plants

c. Structural BMPs

The proposed project would also implement structural BMPs. As detailed in the SWQMP, the general strategy for structural BMP implementation when sizing and designing the treatment devices are hydraulic loading rate to maximizing storm water retention and pollutant removal, as well as the prevent erosion, scour, and channeling within the BMP. The BMPs were sized to treat at 1.5 times the Design Capture Volume. The project’s structural BMPs would include partial retention by biofiltration with partial retention. This would provide combined pollutant control and hydromodification control (see Figure 4.10-2). The structural BMPs would be owned and maintained by Hillel of San Diego in perpetuity.

Permanent project BMPs are shown in Figure 4.11-1.

Storm water BMPs would reduce the amount of pollutants transported from the proposed development project to receiving waters and impacts associated with pollutant discharge would be less than significant. Adherence to the City’s Storm Water Standards is considered to preclude water quality impacts unless substantial evidence supports a fair argument that a significant impact would still occur. Project adherence to the City’s Storm Water Standards comprises the City’s water quality threshold.

a. Phase 1/Phase 2

Water quality is affected by sedimentation caused by erosion, runoff carrying contaminants, and direct discharge of pollutants. Land development generally leads to increased opportunity for contaminated runoff that carries oil, heavy metals, pesticides, fertilizers, and other contaminants to enter a watershed. Table 4-1 of the City’s Storm Water Standards Manual (2012) identifies general pollutant categories that are anticipated or potential pollutants for general project categories.

According to the Water Quality Technical Report (see Appendix H), development of the Phase 1/Phase 2 would generate trash and debris, oil and grease, and heavy metals. Bacteria indicators are a potential pollutant from the project site that is also identified as being potential pollutants/stressors to impaired water bodies. Furthermore, Phase 1/Phase 2 has the potential to generate the following pollutants: sediment, nutrients, organic compounds, oxygen demanding substances, bacteria and viruses, and pesticides.
Under developed conditions, storm events of low intensity or short duration would produce slightly increased amounts of runoff due to the increase in impervious surfaces. With the short-term increase in runoff associated with first flush, some pollutant loads of organic wastes, nitrogen, phosphorous, hydrocarbons, heavy metals, and pesticides would increase over existing conditions.

To meet water quality requirements, Phase 1/Phase 2 would incorporate LID site design source control, treatment control, and construction BMPs, as shown in Figure 4.11-1. BMP selection depends on procedures set forth in the Storm Water Standards Manual and are selected for their effectiveness in precluding or lessening pollutants and conditions of concern specific to Phase 1/Phase 2 and the associated vacant site. The BMPs for Phase 1/Phase 2 are described below.

**Construction BMPs**

The main water quality pollutant of concern on the vacant site during construction activities would be sediment from soil erosion. Erosion control and management of construction activities for the project would be conducted in accordance with the City’s Storm Water Standards and applicable state storm water requirements. Construction activities would be required to comply with the SWRCB NPDES General Permit for Storm Water Discharges Associated with Construction Activity. Per this Permit, the project would be required to submit a Notice of Intent to the SWRCB and prepare a Storm Water Pollution Prevention Plan (SWPPP) detailing the management of storm water on the construction site. A monitoring and reporting program would also be prepared, in accordance with requirements set forth in the Permit. Implementation of the SWPPP and monitoring and reporting program would be subject to inspection and enforcement by the RWQCB.

**Site Design LID IMPs**

Phase 1/Phase 2 would incorporate LID IMPs where feasible to minimize impervious surface areas and promote infiltration and evaporation of on-site runoff. To manage the quantity and quality of storm water runoff, LID practices use site design and specific devices to create a post-development condition that is the same as the hydrologic condition that existed prior to development. The following LID IMPs have been incorporated into the project design:

- Minimize impervious footprint
- Conserve natural areas
- Minimize directly connected impervious areas
- Maximize canopy interception and water conservation
- Construct minimum width sidewalks and parking aisles
- Minimize impervious surfaces
- Protect slopes and channels
- Drain sidewalks into landscaping
- Preserve natural drainage systems
**Source Control BMPs**

- Phase 1/Phase 2 has been designed to reduce on-site storm drain inlets
- Landscaped designed to minimize irrigation and runoff
- Need for future indoor and structural pest control
- Fire sprinkler test water would be drained to the sanitary sewer
- Miscellaneous drain or wash water
- Roofing, gutters, and trim materials would not be made of copper where feasible
- Sidewalks and parking lots to be swept regularly
  - Sediments, trash and debris, and oil and grease; increase awareness of BMPs; employ pest management principles; and employ efficient irrigation and landscape design. The source control BMPs are outlined below.
  - Design outdoor material storage area to reduce pollution
  - Design trash storage areas to reduce pollution introduction
  - Employ integrated pest management principles
  - Use effective irrigation systems and landscape design
  - Provide storm water conveyance system stenciling and signage
  - Management and maintenance personnel training

**Priority Project BMPs**

Based on the City’s SWRAC, Phase 1/Phase 2 is a priority project and would be required to implement additional BMPs to prevent water quality impacts related to the proposed private roads, residential driveways, guest parking, and surface parking areas.

**Roads:** There are no new roads proposed. The existing cul-de-sac, however, would be removed, which would cause an increase in the pervious area.

**Dock Areas:** There are no dock areas proposed.

**Maintenance Bays:** There are no maintenance bays proposed.

**Vehicle Wash Areas:** There are no vehicle wash areas proposed.

**Outdoor Processing Areas:** There are no outdoor processing areas proposed.

**Surface Parking Areas:** The surface parking areas would be constructed using permeable paving. Additionally, landscaping proposed in the parking area would be incorporated into the drainage design and serve as LID IMPs.

**Fueling Areas:** There are no fueling areas proposed.

**Hillside Landscaping:** All project slopes would be landscaped.
Low Impact Design Integrated Best Management Practices

An IMP is a facility that provides small-scale treatment, retention, or detention, and is integrated into the site layout, landscaping, and drainage design. LID IMPs would collectively minimize directly connected impervious areas and promote infiltration. It is possible to incorporate LID features as well as water quality within one LID IMP. The LID IMPs are proposed as the primary method of treatment from the project site. Appendix E of the Water Quality Technical Report provides additional detail on the IMPs, which include bioretention systems and pervious asphalt paving for the parking lot. As detailed in Section 4.10, Hydrology/Drainage, the flow duration analysis conducted for the project showed that the design and sizing of the LID IMPs proposed would comply with the City’s hydromodification requirements identified in the Storm Water Standards Manual (2012).

Sizing Criteria

The first step in LID design is to divide the project site into Drainage Management Areas (DMAs). Each DMA would be one of the following four types: self-treating areas, self-retaining areas (also called “zero-discharge areas”), impervious areas draining to self-retaining, or areas that drain to IMPs. The project would utilize the self-treating areas and areas draining to IMPs. The self-treating areas are areas that do not need additional treatment because pollutants in rainfall and windblown dust would tend to become entrained in the vegetation and soils of landscaped areas. All open areas of landscaping, including landscaping associated with the park, and the non-LID IMP planters, are considered self-treating areas.

Treatment Efficiency

The LID IMPs, consisting of bioretention basins, would provide treatment for runoff from the vacant site similar to the infiltration categories of BMPs from Table 5 of the Storm Water Standards Manual. Based on the information in Table 5 for the bio-filtration category, a medium to high level of treatment can be expected for all of the pollutants anticipated from the project site except pesticides. The removal efficiency for pesticides is listed as “unknown” for the bio-filtration categories and is not listed as high or medium for any category, and oxygen-demanding substances, for which the efficiency is low.

Storm Water BMP Maintenance

Maintenance is a major and integral part of any successful storm water treatment best management program. BMP inspection and maintenance recommendations are provided in the Water Quality Technical Report. These recommendations would assure that the project remains in full compliance with all applicable local, state, and federal regulations relating to storm water management and quality. It shall be the responsibility of the owner to execute a maintenance agreement with the City that meets the City’s requirements.
4.11.4.2 Significance of Impacts

a. Phase 1/Phase 2

The design of Phase 1/Phase 2 proposed project incorporates features to reduce pollutant storm water discharge off-site, thus avoiding significant runoff water quality. Phase 1/Phase 2 proposed project would comply with all applicable federal, state, and local water quality standards through adherence to the City’s new Storm Water Standards. Implementation of the proposed BMPs, including the bioretention facility, would preclude significant potential impacts to increases in pollutant discharge, including downstream sedimentation, to receiving waters during or following construction.
b. Existing with Improvements Option

Implementation of standard construction BMPs would protect storm water and ensure that the risk associated with pollutant discharge is minimized. Therefore, the Existing with Improvements option would not result in an increase of pollutant discharge. Impacts would be less than significant.

4.11.4.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.
4.12 Visual Effects and Neighborhood Character

This section analyzes potential project impacts to neighborhood visual character. The visual aspects of the project, including the height, bulk, scale, and architectural design, are assessed for consistency with relevant design regulations of the General Plan, LDC, LJSPD, and Coastal Height Overlay. Also assessed is the project’s design compatibility with the existing viewsheds and character of the surrounding neighborhood.

4.12.1 Existing Conditions

4.12.1.1 Site Visibility

The La Jolla Community Plan places emphasis on protection of natural areas, open space, residential character, and viewsheds. The Natural Resources and Open Space Systems Element designates view corridors, viewsheds, partial vistas, and scenic overlooks within the La Jolla Community Plan area; there are no designated visual elements on or adjacent to the project site.

The project site is surrounded to the north and west by institutional uses and roadways and to the south and east by a variety of residential development. The project site is east and at a slightly lower elevation than views to the ocean. The northwestern corner of the project site, including the cul-de-sac, are visible from Cliffridge Avenue, La Jolla Village Drive, Torrey Pines Road, and the southwestern portion of the UCSD campus. The intersection of La Jolla Village Drive and Torrey Pines Road provides an open view to this area; however, tall trees and landscaping along the roadways screens views of structures on the university campus.

4.12.1.2 Neighborhood Character

The character of the LJPSD area within the project vicinity is described in the LJPSD Ordinance (Municipal Code, Chapter 11, Article 3, Division 2) as a primarily single-family residential community.

In this primarily single-family residential community, a typical home is characterized by extensive use of glass, shake or shingle overhanging roof, and a low, rambling silhouette. Patios, the atrium or enclosed courtyard, and decks facilitate the "inside-outside" orientation of life in Southern California.

Spanish Mediterranean and Mexican influences are seen in the prevalent use of the arch and of terra cotta and glazed tiles. The residential and commercial structures incorporate an honest use of natural building materials and, in many instances, are characterized as a truly American style of architecture, fusing the purity and geometry of the Mexican-Spanish period with a simplicity of materials and detail with integrated landscape design.
As shown in Figure 4.12-1, the neighborhood adjacent to the project site on the south largely fits this description. The neighborhood is suburban in character; residences here are single-family and mostly one-story rambling-style structures with sloped overhanging roofs and large front yard setbacks. Many were built in the late 1950s and early 1960s. Some have stepped-back two-story elements, most notably in the couple of newer homes that were built in the 1970s and 1980s.

A single-family home (attached, multiple units) development, built in the mid-1970s, lies across La Jolla Scenic Way to the east. West of the project site, across Torrey Pines Road, lies vacant land that is planned and permitted for institutional uses (owned by UCSD). To the north of the project site lies the six-lane La Jolla Village Drive and to the north of it the La Jolla Playhouses and UCSD Campus. The Mandell-Weiss Theatre and Forum and Potiker Theatre are the UCSD structures closest to the project site. These structures are large (seating 492, 400, and 350 patrons respectively) and of a modern design with geometric lines, extensive glazing, and sloping metal overhanging or arching roofs, with materials consisting of natural wood and stone and light or earth-toned stucco and concrete.

As shown in Figure 4.12-1, the undeveloped site where Phase 2 facilities would be located is largely covered with disturbed grasses and dirt foot trails. Two pine trees exist at the far west end of the undeveloped lot. A large palm tree and eucalyptus tree exist on the far eastern portion of the site. Along the northeast corner of the site the pad slopes down approximately 10 feet to the intersection of La Jolla Village Drive and La Jolla Scenic Way.

4.12.1.3 Applicable Design Regulations

Several existing design guidelines and development regulations provide pertinent visual quality and neighborhood character criteria for development in the project vicinity. The General Plan contains aesthetics guidelines, as do the height, bulk, and scale requirements of the LJSPD and Coastal Height Limit Overlay contained within the City’s Land Development Code. These are discussed below.

a. General Plan

The City General Plan implements the City of Villages concept through design considerations such as the provision of high-quality public spaces and civic architecture and the enhancement of visual quality of all types of development. Specifically, the Urban Design Element contains policies for architecture, landscape, and design relevant. Relevant design policies are listed below.

Architecture

**UD-A.5.** Design buildings that contribute to a positive neighborhood character and relate to neighborhood and community context.
b. Encourage designs that are sensitive to the scale, form, rhythm, proportions, and materials proximate to commercial areas and residential neighborhoods that have a well-established, distinctive character.

c. Provide architectural features that establish and define a building's appeal and enhance the neighborhood character.

d. Encourage the use of materials and finishes that reinforce a sense of quality and permanence.

f. Design building wall planes to have shadow relief, where pop-outs, offsetting planes, overhangs and recessed doorways are used to provide visual interest at the pedestrian level.

g. Design rear elevations of buildings to be as well-detailed and visually interesting as the front elevation, if they will be visible from a public right-of-way or accessible public place or street.

j. Provide convenient, safe, well-marked, and attractive pedestrian connections from the public street to building entrances.

UD-A.6. Create street frontages with architectural and landscape interest to provide visual appeal to the streetscape and enhance the pedestrian experience.

e. Minimize the visual impact of garages, parking, and parking portals to the pedestrian and street façades.

Landscape

UD-A.8. Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.

a. Maximize the planting of new trees, street trees and other plants for their shading, air quality and livability benefits.

b. Encourage water conservation through the use of drought tolerant landscape.

c. Use landscape, especially revegetation, to support storm water management goals and BMPs for filtration, percolation, and erosion control.

d. Use landscape to provide unique identities within neighborhoods and villages.

g. Unify communities by using street trees to link residential areas.

h. Provide “shade over pavement” in concrete areas, especially parking areas (vehicular use areas).

k. Consider landscaped areas as useable and functional amenities for people activities.
Transit Integration

**UD-A.9.** Incorporate existing and proposed transit stops or stations into project design.

d. Locate buildings along transit corridors to allow convenient and direct access to transit.

Surface Parking

**UD-A.12.** Reduce the amount and visual impact of surface parking lots.

i. Use trees, shade structures, and other landscape to provide shade, and screening and filtering of storm water runoff, in parking lots including roof-level parking areas.

Residential Design

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

a. Integrate new construction with the existing fabric and scale of development in surrounding neighborhoods. Taller or denser development is not necessarily inconsistent with older, lower-density neighborhoods, but must be designed with sensitivity to existing development. For example, new development should not cast shadows or create wind tunnels that will significantly impact existing development and should not restrict vehicular or pedestrian movements from existing development.

b. Design new construction to respect the pedestrian orientation of neighborhoods.

Residential Street Frontages

**UD-B.4.** Create street frontages with architectural and landscape interest for both pedestrians and neighboring residents.

a. Locate buildings on the site so that they reinforce street frontages.

b. Relate buildings to existing and planned adjacent uses.

e. Locate transparent features such as porches, stoops, balconies, and windows facing the street to promote a sense of community.

g. Minimize the number of curb-cuts along residential streets.
b. Land Development Code/La Jolla Shores Planned District Ordinance

The LDC contains the City’s planning, zoning, subdivision, and building regulations that dictate how land is to be developed within the City. Through specified maximum building heights; lot coverage; floor area ratios; front, rear, and side yard setback requirements; and restrictions on signage, fencing, outdoor storage, lighting, and so on, the City’s LDC provides guidelines for project design. Because the project site also lies within the LJSPD, it is subject to the additional development regulations of the LJSPD ordinance to address the specific needs of the La Jolla Shores area.

As outlined in the LJSPD regulations (Municipal Code Sections 1510.0101 et. seq.), the intent of the LJSPD is to “protect the La Jolla Shores Area from impairment in value and to retain and enhance its distinctive residential character and open seascape orientation. Development of land in La Jolla Shores should protect and enhance the area’s unique ocean-oriented setting, architectural character and natural terrain, and enable the area to maintain its distinctive identity as part of one of the outstanding residential areas of the Pacific Coast.”

As outlined in the LJSPD regulations (Municipal Code Sections 1510.0101 et. seq.), the intent of the LJSPD is to “protect the La Jolla Shores Area from impairment in value and to retain and enhance its distinctive residential character and open seascape orientation. Development of land in La Jolla Shores should protect and enhance the area’s unique ocean-oriented setting, architectural character and natural terrain, and enable the area to maintain its distinctive identity as part of one of the outstanding residential areas of the Pacific Coast.”

**General Design Principle and Requirements**

The LJSPD ordinance includes the following excerpted design principle and requirements:

**Design Principle:**

Originality and diversity in architecture are encouraged. The theme “unity with variety” shall be a guiding principle. Unity without variety means simple monotony; variety by itself is chaos. No structure shall be approved which is substantially like any other structure located on an adjacent parcel. Conversely, no structure will be approved that is so different in quality, form, materials, color, and relationship as to disrupt the architectural unity of the area.

**Design Requirements:**

- Building materials and color are the most critical unifying elements. For this reason, roof materials within the LJSPD shall be limited to wood shakes, wood shingles, clay tile, slate or copper of good quality where the pitch is 4 in 12 or greater or other materials which would contribute to the character of the surrounding neighborhood. Roofs with a pitch of less than 4 in 12 may also be covered with crushed stone of muted dark tone.
• Exterior wall materials shall be limited to wood siding, wood shingles, adobe and concrete blocks, brick, stucco, concrete, or natural stone. White and natural earth colors should predominate. Primary colors may be used for accent.

• Lighting which highlights architectural features of a structure shall be permitted. Such lighting shall be unobtrusive and shielded so as not to fall excessively on adjacent properties.

• Appurtenances on the roof shall be enclosed or otherwise designed or shielded to be attractive.

Grading Regulations

The intent of the Grading Regulations of the LJSPD are to "preserve canyons and to prevent the cutting of steep slopes and the excessive filling to create level lots. No grading or disruption of the natural terrain shall be permitted until a permit which includes grading has been approved by the City Manager".

Grading plans may be approved if:

• the development would result in minimum disturbance of the natural terrain and vegetation commensurate with the use of the lot or premises;

• grading, excavation and filling in connection with the development would not result in soil erosion, silting of lower slopes, slide damage, flooding problems, or excessive cutting or scarring; and

• the development would strive to preserve and enhance the natural environment and any existing aesthetic qualities of the site.

Single-Family Zone Development Regulations

The specific LJSPD Development Regulations for the Single Family Zone that are relevant to the visual aspects of the project include the following:

• Building and structure setbacks shall be in general conformity with those in the vicinity.

• No building or structure shall be erected, constructed, altered, moved, or enlarged to a greater height than 30 feet. (This is consistent with the Coastal Height Limit Overlay Zone.)

• No building or structure shall be erected, constructed, altered, moved in, or enlarged to cover more than 60 percent of the lot or parcel.
Landscaping

- In the Single Family Zone, all of the property not used or occupied by structures, unplanted recreational areas, walks, and driveways shall be landscaped and may include native materials, and in no case shall this landscaped area be less than 30 percent of the total parcel area. All landscaping and irrigation shall be developed in conformance with the Landscape Guidelines of the Land Development Manual.

- All landscaping shall be completed within six months of occupancy or within one year of the notice of completion of a residence.

- All landscaped material shall be permanently maintained in a growing and healthy condition, including trimming as appropriate to the landscaping material.

Parking

- Off-street parking shall be provided in accordance with Land Development Code Chapter 14, Article 2, Division 5 (Parking Regulations).

- All parking areas (excluding ingress and egress, but including areas between driveways) shall be screened from public rights-of-way and adjoining properties by fences, walls, buildings, planting, or a combination thereof. Said fences, walls, buildings and planting shall have a height of not less than four feet except that higher than four-foot fences, walls, buildings or planting may be required to provide adequate screening if the adjoining property is substantially higher than the parking area.

- A minimum of 10 percent of the interior of parking lots containing more than 20 parking spaces shall be landscaped and provided with a permanent underground watering system. This requirement is in addition to planting used for screening as permitted above.

c. La Jolla Shores Design Manual

As detailed in Section 4.1, Land Use, architectural criteria and design standards are set forth in the La Jolla Shores Design Manual (adopted in 1974) and are to be used in the evaluation of the appropriateness of any development within the LJSPD. The Design Manual includes General Design Guidelines (including grading, lighting, landscaping, and off-street parking), as well as Residential and Visitor Area Guidelines (including building heights and lot coverage, the house, and street environment). In some instances, guidelines from the La Jolla Shores Design Manual are included in the LJSPDO (detailed above), and thus are not repeated below. The additional applicable guidelines in relation to visual effects and neighborhood character contained within the Design Manual are outlined below.
General Design Guidelines

The intent of the General Design Guidelines is to preserve and enhance the environmental quality of La Jolla Shores as a place to live. Large high-rise buildings out of scale with other structures within the community as well as automobile drive-in and drive-through establishments are prohibited. To conserve important design character in La Jolla Shores, some uniformity of detail, scale, proportion, texture, materials, color, and building form is necessary. Specific recommendations provided within the General Design Guidelines are detailed below.

- Large buildings interposed into communities characterized by small-scale structures without adequate transition should be avoided.

- Visually strong buildings which contrast severely with their surroundings impair the character of the area.

- Structures shall conform or complement the general design and bulk of the buildings in surrounding and adjacent areas.

- Promote harmony in the visual relationships and transitions between new and older buildings.

- New buildings should be made sympathetic to the scale, form and proportion of older development. This can be done by repeating existing building lines and surface treatment.

- Originality and diversity in architectural design is encouraged. Except under unusual circumstances no structure shall be approved which is substantially like any other structure unless those structures complement each other.

- Extreme contrasts in color, shape, and organization of architectural elements should be avoided, so that new structures do not stand out in excess of their importance. Materials should be compatible with the existing character of La Jolla Shores.

- Roof materials should be limited to wood shakes, wood shingles, clay tile, slate or copper of good quality, where the pitch is 4 in 12 or greater. Roofs less than 4 in 12 may also be covered with crushed stones of muted dark tones.

- Exterior wall materials should be limited to wood siding, wood shingles, clapboard, adobe blocks, brick, stucco, concrete or natural stone of good quality. In selecting building materials, the efficient use of natural materials and natural resources should be considered in evaluating the merits of the project.

- Colors should be muted, white or natural earth colors (browns, greens, grays, etc.). The use of non-earth colors is allowed for architectural accent.
Grading

It is the intent of the guidelines to preserve natural land forms. Where grading is necessary, the slopes should be contour graded and landscaped. Decrease to the extent possible the necessity of grading and the creation of large, level land areas.

- Retain smooth flow of grand form; minimize steep slopes. Avoid harsh, easily eroded forms and high, steep banks.
- Permit narrower roadways by elimination of the on-street parking requirement. Additional parking should be provided in private motor courts.
- Permit grading of the roadway. Leave or shape into a natural form as much of the right-of-way as possible.

Lighting

Light quality must be geared to the specific use of the area, such as warm, simple lighting. The lighting must be more human in scale, closer spaced, and lower than is usually found in other areas. Each light must also be attractive to look at during the day when the pole, base, and light add another dimension to the urban scene.

- The public sidewalks, places and alleys, exteriors, roofs, outer walls and fences of buildings and other constructions and signs visible from any public street, place or position shall not be illuminated by privately controlled floodlights or any other illumination except as permitted herein.
- Building or roof outline tube lighting shall not be acceptable. Building or wall lighting shall be indirect. A limited number of spotlights may be used to create shadow, relief or outline effects when such lighting is concealed or indirect.
- Interior building lighting shall not be used as an advertising device.
- Define the organization of streets and circulation. Lighting of pedestrian walks, plazas, and buildings should be well lit with numerous small fixtures. If floodlighting is used, their sources should be well hidden. Light sources should be low and closely spaced to maintain pedestrian scale. The maximum height, with the exceptions of safety lights at intersections, should be approximately 12 feet. Intersections might have increased wattage for definition and to alleviate automobile/pedestrian conflicts. The effect would be one of varying-size pools of light. Either gas or electric lights would be suitable. Do not use neon, mercury vapor, exposed florescent, or any high intensity lights for permanent installations.
- Parking areas should be well lit, but with numerous small fixtures or floodlights from a hidden light source.
Landscaping

The landscaping design should take into consideration and be compatible with the shape and topography of the area, the architecture of the project, the architectural characteristics of adjacent landscaping, and topography. The livability, amenity, and character of residential areas are greatly enhanced by trees, more so than by any other single element.

- In areas where houses have no front yard, a sense of nature should be provided by planting in the sidewalk area.
- Areas of poor environmental quality can often be improved by the addition of benches, trees, shrubs, and textured paving.
- Trees form one of the single most important visual features of the city. Linear tree plantings shade and enhance the neighborhood and core area streets. Informally grouped groves in neighborhood parks and tot lots impart a naturalistic effect. Large specimen trees provide focal points in small plazas and can be grouped with seating areas and fountains.

Off-street Parking

This section is intended to provide to the developers of off-street parking lots information and guidance regarding the requirements for the dimensioning and landscaping of parking lots. These requirements have since been updated for the LJSPD within the Municipal Code (§1510.0401 Off-Street Parking Construction, Maintenance and Operation Regulations). Applicable requirements related to the visual aspect of off-street parking were previously identified under the LJSPDO regulations.

Residential and Visitor Area Guidelines

The intent of these guidelines is to preserve and enhance the environmental quality of La Jolla Shores as a place to live. These guidelines include general recommendations, as well as specific guidance for building heights and lot coverage, the house, and street environment.

Building Heights and Lot Coverage

The requirements for building heights and lot coverage are the same as within the LJSPDO, as identified above (see Single-Family Zone Development Regulations).

The House

This section of the Design Manual does not provide specific guidance for non-residential use. However, the section contains guidelines for higher-density residential buildings, such as apartments, in order to better blend in within a single-family residential zone. Thus, this portion of the guidelines is outlined below, as they would be applicable to Phase 1/Phase 2.
• Design apartments to present less apparent bulk. Use care in the choice of materials to blend the apartments in with the surrounding neighborhood.

• Arrange apartment development in such a way as to harmonize with adjacent single family districts. Minimize clash of scale and activity pattern between apartments and houses by arranging apartment buildings adjacent to two-story, duplex, or townhouses to provide a scale transition.

• Provide visual separation. Set apartments in a group of their own, particularly if they are bulky. Provide a landscaped buffer. If apartments and single family houses are not visible in one glance, then any clash of scale disappears.

Roofs are a visually most important element; no other single element of design will contribute to neighborhood continuity as effectively as the use of similar roof materials and colors.

• Use simple shapes

• Use a simple range of colors and materials.

• For interest and variety yet with overall unity the following roof forms are permitted (singularly or in combinations): flat roofs, mansard roofs, hipped roofs, gabled roofs, and shed roofs.

Street Environment

Residential streets should provide safe, convenient traffic circulation and access to homes within the neighborhood.

• Reduce pavement width where possible to bring the street into a better scale relationship to the houses.

• Provide the maximum street tree planting.

• Underground all utilities

• Design all curves, intersections and cul-de-sacs and their relationships to houses for the best visual effect.

A detailed analysis of these regulations is contained within Section 4.1, Land Use.

4.12.2 Significance Determination Thresholds

Based on the City's 2011 CEQA Significance Determination Thresholds, impacts related to visual quality and neighborhood character would be significant if the project would result in:
4.12 Visual Effects and Neighborhood Character

- The creation of a negative aesthetic site or project;
- Substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously undeveloped area;
- Substantial change in the existing landform;
- Substantial light or glare which would adversely affect daytime or nighttime views in the area.

4.12.3 Issue 1: Development Features

Would the project result in the creation of a negative aesthetic site or project?

Pursuant to the City’s Significance Determination Thresholds, impacts related to development features would be significant if:

- **Organized Appearance**: The project would create a disorganized appearance and would substantially conflict with City codes;
- **Height, Bulk, and Coverage Consistency**: The project significantly conflicts with the height, bulk, or coverage regulations of the zone that does not provide architectural interest;
- **Visible Walls**: The project includes crib, retaining, or noise walls greater than six feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public; or
- **Varied Visual Environment**: The project is large and would result in an exceedingly monotonous visual environment.

4.12.3.1 Impacts

a. Phase 1/Phase 2

**Organized Appearance**

The General Plan, LJSPD, and the La Jolla Shores Design Manual set forth design guidelines and requirements, as detailed above in Section 4.12.1.3. The underlying principle for each of these is that originality and diversity in architecture are encouraged, and the theme “unity with variety” shall be a guiding principle.

Phase 1 would involve the temporary use of the Cliffridge property during construction of Phase 2. The temporary use of the property would continue as it has for the past several years, without any disruption of the site’s organized appearance. Phase 1/Phase 2 would involve new
and enhanced landscaping to create a more visually pleasing and well-organized appearance to the site than what exists today. The existing visual environment of the cul-de-sac area is shown in bottom photo of Figure 4.12-2. The existing driveway to the Cliffridge property is shown in the center of the photo. As illustrated in Figure 3-9, the landscape concept plan for Phase 1 includes the placement of native trees and shrubs on the northern portion of the site where the cul-de-sac was to add visual interest to the site and to screen the property from the sidewalk and La Jolla Village Drive.

Figures 3-4, 3-5, 3-6, 3-12, and 3-13 illustrate the layout and profile of Phase 2. As shown in these figures, the siting and orientation of the three buildings around a central courtyard, with the parking area off to the rear, would comprise a well-organized site. The almost interlocking form of the three structures and their rhythmic sloping rooflines, glazing placement, and patterned use of stone veneer with earth-toned stucco and concrete surfaces, would yield a well-organized visual appearance.

The landscaping for Phase 2 (see Figures 3-10 and 3-11) would provide further organization of the site through selective placement of shade trees, flowering shrubs and screening vegetation, and through the patterned provision of street trees along the north, east, and south street frontages. The street trees would be Torrey pines, planted at regular intervals, thus maintaining continuity with the Torrey pines theme of the LJSPD area.

A landscaped, park-like amenity west of the structures would contain a well-planned arrangement of groundcover plantings, low-spaying shrubs, and taller trees. A meandering bike path would traverse the far west portion of this park-like area and contain a bench, trash can, and drinking fountain. This area would maintain the present open-space feel of the site and provide a balance to the new structures. Overall, Phase 1/Phase 2 would have an organized, unified appearance while also providing variety, in accordance with the principles of the General Plan, LJSPD, and Design Manual.

**Height, Bulk, and Coverage Consistency**

As previously detailed in Section 4.1.4.1a, Phase 1/Phase 2 would comply with relevant height, bulk, and coverage regulations. Neither phase proposes any deviation to the LDC’s height, bulk, or coverage regulations. During Phase 1, building height and coverage would remain as existing. Phase 2 building heights would range from 18 to 28 feet, and would be consistent with the LDC, Coastal Height Overlay Zone, and the Design Manual by not exceeding 30 feet. The proposed lot coverage for Phase 2, with the landscaped area, would be 15.8 percent, and would be consistent with the LDC, LJSPD, and the Design Manual by not exceeding 60 percent of the lot. As detailed in Section 4.1.4.1a (see also Figure 4.1-1), the approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks, which average approximately 9 feet.
Phase 1/Phase 2 would comply with all other relevant development and design regulations with the exception of one deviation identified in Section 3.3 being requested from the LDC. These deviations are discussed briefly below in terms of its aesthetic effects.

The deviation being requested for Phase 1/Phase 2 includes a deviation from the LDC’s Driveway Curb Cut regulations requiring a 24-foot-wide driveway cut. As outlined in Chapter 3, Project Description, Municipal Code Section 142.0560 (Development and Design Regulations for Parking Facilities) requires lots for nonresidential uses greater than 50 feet in width to provide a 24-foot-wide driveway curb cut. During Phase 1 (i.e., construction of Phase 2), the project applicant proposes a 12-foot-wide temporary curb cut in order to accommodate the non-residential uses on a temporary basis until Phase 2 is approved. Upon approval of Phase 2, the Cliffridge property would return to residential use and the 12-foot-wide driveway would be adequate. This aspect of the deviation would have no aesthetic effect.

As discussed throughout this section, the proposed parking lot consisting of 27 parking spaces would have a less than significant aesthetic effect due to proposed landscaping, lighting, and other regulatory mandated design features.

Visible Walls

Phase 1/Phase 2 would include the construction of retaining walls along the northeastern edge of the proposed parking lot and along the westerly perimeter and northwest corner of the proposed two-story HCJL center building that would be visible to the public (see Figures 3-12 through 3-14). However, these walls would be less than six feet in height from the proposed grade and would be visually screened with vegetation. The retaining walls would also be consistent with the Design Manual, specifically the guideline which states that “fence lines and planting should blend with the terrain rather than strike off at an angle against it” (page 44 of the Design Manual).

Varied Visual Environment

The proposed architecture and landscape of Phase 1/Phase 2 would be varied in form, material, and color to avoid a monotonous visual environment, while at the same time it would provide a rhythmic, well-organized appearance consistent with the LJSPD’s “unity with variety” design principle. The rhythmic sloping rooflines and articulated facades of the three separate structures would provide visual variety, as would the structures’ use of stone, earth-toned stucco, concrete, and metal. The patterned use of these various materials, in complementary earth tones, would add unity and organization, as would the patterned glazing placement and exterior landscaping. The design features would ensure that the appearance of the project site, the architectural design, and the overall visual environment would not have a negative visual appearance. As detailed above, the theme “unity with variety” is the guiding principle of the LJSPD and Design Manual. Originality and diversity in architectural design is encouraged. Phase 1/Phase 2 would be consistent with this guiding principle of the LJSPD and Design Manual. Therefore, impacts related to the visual appearance would be less than significant.
b. Existing with Improvements Option

Organized Appearance

The Existing with Improvements option would comply with all relevant City codes, with the exception of a deviation from the maximum hardscape in residential zone requirement. This deviation is minor in scope and does not comprise a substantial conflict with the City’s LDC. The negligible aesthetic effect is discussed below under Height, Bulk, and Coverage Consistency.

The appearance of the Cliffridge property that comprises the Existing with Improvements option is well organized. It is a one-story structure with a detached garage, a large landscaped front and back yard, and perimeter. A photograph of the front of the Cliffridge property is shown in Figure 4.12-2.

Modifications to the site for the Existing with Improvements option would include interior structural upgrades, landscaping, redesign of the driveway to the garage, and construction of a parking lot and a new 24-foot-wide driveway cut on Cliffridge Avenue north of the Cliffridge property. These modifications would comply with the aesthetic elements of all City codes, including the design guidelines of the LJSPD. This would ensure that the appearance of the site would remain well organized. Demolition of the garage and patio structures is required to accommodate the on-site parking lot. As discussed below, landscaping is intended to screen this area.

Height, Bulk, and Coverage Consistency

The building height of the residential structure on the Cliffridge property would remain the same. The building coverage would also remain the same and would be consistent with the LDC and LJSPD and would not exceed 60 percent of the lot. The Existing with Improvements option would comply with all other relevant development and design regulations with the exception of the deviation being requested from the LDC. This is discussed briefly below in terms of its aesthetic effect.

Deviation from the Maximum Paving and Hardscape in Residential Zones Requirement

Per this regulation, paving and hardscape for vehicle use on lots less than 10,000 square feet in residential zones are required to be limited to off-street surface parking for a maximum of four vehicles. The Existing with Improvements option would require a deviation from this requirement to allow hardscape improvements to accommodate six on-site parking spaces. The additional parking paving would be provided as part of the driveway redesign and would be sufficiently screened with existing and new landscape materials to preclude a negative aesthetic effect.
Visible Walls

The existing wall at the property boundary would remain intact. The Existing with Improvements option would not involve any crib or retaining walls or any unscreened noise walls greater than six feet in height and 50 feet in length.

Varied Visual Environment

The Existing with Improvements option would not create a monotonous visual environment. As shown in Figure 4.12-2, the appearance of the residential structure on the Cliffridge property is varied, with an articulated front façade, recessed door entrance, protruding front window, and varied, sloped roofline. Trees and shrubbery on the corners of the lot provide variety and balance to the front lawn.

If the project components in the Existing with Improvements option are implemented, the Cliffridge property would be modified on the interior, the utility pole (shown in the right of the upper photo in Figure 4.12-2) would be moved and the utility line undergrounded, a new curb cut, a driveway would be paved along the northerly edge of the lot next to the tree and shrubbery shown in the right corner of the upper photo in Figure 4.12-2 (which would remain), and landscaping would be provided along the north edge of the lot. Similar to existing site conditions, this landscaping would be composed of a variety of drought-tolerant plant species in varying heights, shapes, and colors. The resulting visual environment would not be monotonous.

4.12.3.2 Significance of Impacts

a. Phase 1/Phase 2

Phase 1/Phase 2 would not result in a disorganized appearance inconsistent with relevant City codes, would not exceed height, bulk, or coverage regulations, would not construct walls in excess of height or length maximums, and would not create a monotonous visual environment. The design of Phase 1/Phase 2 would instead result in the creation of a well-organized visual environment. A negative visual appearance would not result from implementation of Phase 1/Phase 2, and visual impacts would therefore be less than significant.

b. Existing with Improvements Option

The Existing with Improvements option would not result in a disorganized appearance inconsistent with relevant City codes, would not exceed height, bulk, or coverage regulations, would not construct walls in excess of height or length maximums, and would not create a monotonous visual environment. The Existing with Improvements option would instead maintain a well-organized visual environment. A negative visual appearance would not result from this option, and visual impacts would therefore be less than significant.
4.12.3.3 Mitigation Monitoring and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.

4.12.4 Issue 2: Neighborhood Character

Would the project result in substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously undeveloped area?

Pursuant to the City’s Significance Determination Thresholds, impacts related to neighborhood character would be significant if:

- **Bulk and Scale:** The project exceeds the allowable height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin.

- **Architectural Style and Building Materials:** The project would have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme.

- **Community Landmarks:** The project would result in the physical loss, isolation, or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) which is identified in the General Plan, applicable community plan, or local coastal program.

- **Highly Visible Area:** The project is located in a highly visible area (e.g., on a canyon edge, hilltop, or adjacent to an interstate highway) and would strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections.

4.12.4.1 Impacts

a. Phase 1/Phase 2

*Bulk and Scale*

The oblique aerial in Figure 4.12-3 shows the immediate neighborhood of the project site and gives a sense of its bulk and scale. The neighborhood is suburban in character, with one- and two-story single-family residences to the south, one- and two-story single-family attached homes east across
La Jolla Scenic Way, and the six-lane La Jolla Village Drive and UCSD Campus to the north, where the La Jolla Playhouses are in a clustered arrangement. Each playhouse seats upwards of 400 people and has a building square footage in the range of 6,500.

A general bulk and scale survey of existing residential structures proximate to the project site is provided in Table 4.12-1. This data was obtained from online public records and includes the 12 closest single-family residences facing the project site from the south, and the single-family attached homes to the east. The 13 structures identified in the table are shown numbered in Figure 4.12-3.

### Table 4.12-1

<table>
<thead>
<tr>
<th>Unit</th>
<th>Building SF</th>
<th>Lot SF</th>
<th>Bedrooms/Baths</th>
<th>Year Built</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1,740</td>
<td>7,800</td>
<td>3/2</td>
<td>1958</td>
</tr>
<tr>
<td>2</td>
<td>2,338</td>
<td>8,000</td>
<td>3/2</td>
<td>1958</td>
</tr>
<tr>
<td>3</td>
<td>1,817</td>
<td>8,000</td>
<td>3/2</td>
<td>1959*</td>
</tr>
<tr>
<td>4</td>
<td>3,469</td>
<td>8,000</td>
<td>4/4</td>
<td>1970</td>
</tr>
<tr>
<td>5</td>
<td>2,424</td>
<td>8,400</td>
<td>4/3</td>
<td>1958</td>
</tr>
<tr>
<td>6</td>
<td>1,655</td>
<td>8,000</td>
<td>3/2</td>
<td>1958</td>
</tr>
<tr>
<td>7</td>
<td>3,464</td>
<td>9,200</td>
<td>4/4</td>
<td>1980</td>
</tr>
<tr>
<td>8</td>
<td>1,818</td>
<td>10,000</td>
<td>3/2</td>
<td>1961</td>
</tr>
<tr>
<td>9</td>
<td>2,336</td>
<td>9,800</td>
<td>3/2</td>
<td>1962</td>
</tr>
<tr>
<td>10</td>
<td>1,724</td>
<td>8,800</td>
<td>3/2</td>
<td>1960</td>
</tr>
<tr>
<td>11</td>
<td>2,458</td>
<td>8,500</td>
<td>4/3</td>
<td>1962</td>
</tr>
<tr>
<td>12</td>
<td>2,030</td>
<td>8,000</td>
<td>3/2</td>
<td>1961</td>
</tr>
<tr>
<td>13**</td>
<td>3,078</td>
<td>4,970</td>
<td>6/4.5</td>
<td>1974</td>
</tr>
</tbody>
</table>

Average: 2,335, 8,267

SF = square feet  
*Original owner  
**Two attached, single-family homes considered one structure and one lot area

As shown in this table, many of the nearby existing homes are three-bedroom, two-bath homes with two-car garages on large lots typical of the time. The larger four-bedroom home identified in the table has a three-car garage. The average building and lot size of the surveyed single-family homes is 2,335 square feet of building on 8,267 square feet of lot. The attached single-family homes have a shared wall and occur in a single, larger structure.

As detailed above in Section 4.12.3.1, the LJSPD and Design Manual also set requirements for height, bulk, and coverage consistency within the area. Phase 2 would consist of the construction of three individual structures with an overall building net square footage of 5,772 square feet, situated around a central outdoor courtyard. The proposed partial two-story (i.e., stepped back second story) HCJL Center would have a net square footage of 3,298. It would be the most westerly of the three buildings and adjoin the proposed park-like space. The Library/Chapel would be the smallest of the three buildings and would be located in the central portion of the developed area, north of the courtyard and east of the HCJL center. The
Library/Chapel would be a one-story building of 984 net square feet. The Professional Leadership Building would be an approximate 1,813 net square foot one-story building south of the courtyard and library/chapel and southeast of the HCJL center.

Parking associated with these uses would be provided in a 27-space surface parking lot located east of the three structures. Portions of the parking area (eastern and southern parking spaces) would include a carport structure with solar photovoltaic panels on top.

The height of the Phase 2 structures would conform to regulated height maximums and with existing heights in the neighborhood. The neighboring existing homes to the south are generally 15 to 24 feet in height, while the attached single-family units to the east are lower, as they are approximately 4 to 12 feet below grade. The Phase 2 structures would be from 18 to 28 feet in height. The bulk and scale of the Phase 2 structures would also be comparable with existing residences. The 3,298-square-foot HCJL center, the largest of the proposed structures, would be the same approximate size of one of the larger four-bedroom homes south of La Jolla Scenic Drive North and of the four-bedroom attached single-family units east of La Jolla Scenic Way. The smaller Professional Leadership Building (1,813 gross square feet) and Library/Chapel (984 gross square feet) would be comparable in size to some of the three-bedroom existing homes on La Jolla Scenic Drive North and Cliffridge Avenue.

The three structures would be clustered, and when combined their total net square footage of 5,772 would exceed the average size of existing single-family homes, but would be comparable to the size of one of the La Jolla Playhouses. Given that the clustered design incorporates open spaces between the structures and a large open central courtyard, the resulting sense of scale is minimized and the bulk of the project would not be out of scale or monotonous. As shown in the project building elevations in Figures 3-12A-B, it is the intent of the design that when the structures are viewed from adjacent streets and houses, they would appear interrelated but separate, with views extending through the site’s open pathways and spaces. Also as shown in these elevations, the sloping rooflines and other angled planes of the structures’ facades would additionally serve to add a sense of movement and hence lightness to the overall design. Overall, Phase 1/Phase 2 would not exceed the allowable height or bulk regulations, nor would it exceed the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin.

**Architectural Style and Building Materials**

The continued use of the Cliffridge property as temporary office space during Phase 1 would not result in any changes to the existing architectural style. New landscaping associated with Phase 1 would be installed in the area immediately north of the lot that would further screen the structure from the north and provide landscaping.

The vacant site associated with Phase 2 could be considered to be in a transitional area, where suburban residential development borders attached single-family homes, major roadways, and institutional uses (Figure 4.12-4). While the character of the neighborhood to the south is low-
density and post-war, the character of the attached single-family homes to the east is denser, and the area to the north is of an institutional character with large utilitarian structures.

The Phase 2 architectural design reflects a contemporary architectural style that would relate in scale and design to the single-family residential area along La Jolla Scenic Drive North through the siting of three individual structures around an outdoor courtyard and through use of complementary architectural form, materials, and color.

Color renderings of the Phase 2 project are shown in Figures 3-12 through 3-14. The sloped rooflines, rambling profile, articulated facade, recessed entries, windowed projections, and inner courtyard would reflect common elements of LJSPD and neighborhood design. The use of glass, natural stone and wood, and earth-toned stucco and concrete surfaces proposed for Phase 2 would conform to LJSPD design and Design Manual requirements, as well as to materials and colors used in the existing neighborhood.

The views of the existing cul-de-sac from La Jolla Scenic Drive North and from the intersection of La Jolla Village Drive at Torrey Pines Road are shown in Figure 4.12-5. This area would be enhanced with landscaping and pedestrian amenities. The landscape plan of Phase 1/Phase 2 includes a variety of plants, shrubs, and trees, and emphasizes California native species, including Torrey pines, which reflect the neighborhood’s emphasis on landscape features and the broader community’s emphasis on Torrey pines as a symbol of the community. Specifically, through street tree plantings of Torrey pines and a landscaped pedestrian pathway where the cul-de-sac was, Phase 1/Phase 2 would enhance the corner of Torrey Pines Road and La Jolla Village Drive and provide an appealing entrance to the La Jolla Shores community.

The park-like area proposed west of the structures would also provide a community amenity as well as retain the open space feel of the existing lot for neighboring residents. A meandering bike path through this area would provide enhanced pedestrian and bicycle connectivity from the neighborhood at La Jolla Scenic Drive North to Torrey Pines Road/La Jolla Village Drive. A bench, trash receptacle, and drinking fountain located to the side of the bike path would add to the neighborhood park feel.

Other neighborhood-sensitive design features that would be incorporated into Phase 2 include the grading of the parking lot four to six feet lower than the courtyard and building pad level to help soften the perceived height of the site at the corner of La Jolla Village Drive. The siting of the parking lot and street yard would provide a spatial buffer along La Jolla Scenic Way to the multi-family residential development across the street. The landscaping and partial height walls along this edge would also provide a visual screening of the parking lot.

Overall, the architectural and landscape design of the Phase 2, including the use of building materials and plant palette, would blend in with the residential neighborhood to the south and the community as a whole. Some features of the project design could also be seen as enhancing neighborhood character, such as the provision of Torrey pine trees along La Jolla Village Drive and La Jolla Scenic Drive North frontages, the provision of the landscaped park-
like amenity, and the walk/bike path in the northwest portion of the site, and the provision of a community service.

**Community Landmarks**

As stated above, impacts would be considered significant if the project would result in the physical loss, isolation, or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) which is identified in the General Plan, applicable community plan, or local coastal program. One of the goals of the La Jolla Community Plan is to “protect the environmentally sensitive resources of La Jolla's open areas including its coastal bluffs, sensitive steep hillside slopes, canyons, native plant life and wildlife habitat linkages.” No environmentally sensitive resources, including coastal bluffs, sensitive steep hillside slopes, canyons, or wildlife habitat linkages exist on the project site. As detailed in Section 143.0110 of the Municipal code: “Generally, the steep hillside regulations of the Environmentally Sensitive Lands Regulations are applicable when development is proposed on a site containing any portions with a natural gradient of at least 25 percent (25 feet of vertical distance for every 100 feet of horizontal distance) and a vertical elevation of at least 50 feet.” The moderate slopes on the project site do not meet these criteria. As detailed in Section 4.3, the project site contains disturbed habitat with primarily non-native plant species.

The Phase 1/Phase 2 project would enhance the landscaping and would use California native species and Torrey pines. The landscaping is intended to be drought-tolerant. Through a landscaped pedestrian pathway, the Phase 2 would enhance the corner of Torrey Pines Road and La Jolla Village Drive and provide a new entrance to the La Jolla Shores community from the north. Therefore, Phase 1/Phase 2 would not result in the physical loss, isolation, or degradation of a community identification symbol or landmark (e.g., a stand of trees, coastal bluff, historic landmark) which is identified in any applicable plans.

**Highly Visible Area**

The vacant site associated with Phase 1/Phase 2 is not located in a highly visible area, such as on a canyon edge, hilltop, or adjacent to an interstate highway. The site is visible from La Jolla Village Drive, a Primary Arterial roadway where 44,790 vehicles travel per day. As detailed above, Phase 1/Phase 2 would not strongly contrast with the surrounding development or natural topography through excessive height, bulk, signage, or architectural projections. As discussed above in Section 4.12.3.1a, Phase 1/Phase 2 would comply with all relevant height, bulk, and coverage regulations. No building signage or architectural projections are proposed under Phase 1/Phase 2. As discussed above, some features of the project design would enhance neighborhood character. These features include the provision of Torrey pine trees along La Jolla Village Drive and La Jolla Scenic Drive North frontages, the provision of the landscaped park-like amenity and walk/bike path in the northwest portion of the site, and the enhanced pedestrian orientation of the area surrounding the project site.
Overall, neighborhood character impacts associated with Phase 2’s architectural design, use of building materials, and preservation of community landmarks would not be significantly adverse.

**b. Existing with Improvements Option**

**Bulk and Scale**

The bulk and scale of the Cliffridge property is typical of the adjacent neighborhood. The Existing with Improvements option would consist of minor interior and exterior upgrades, none of which would generate any change in bulk or scale relative to the surrounding neighborhood.

**Architectural Style and Building Materials**

The Cliffridge property being used by Hillel is a one-story, clapboard-sided, rambling style, three-bedroom, two-bath house built in 1958 (see Figure 4.12-2). The adjacent houses on Cliffridge Avenue and east along La Jolla Scenic Drive North are also mostly one-story, each different than the next, but of similar vintage and rambling ranch house or cottage silhouette with large front and rear yards, hence an emphasis on landscaping features. All have pitched overhanging roofs, and some have bay or protruding windows. Most have articulated front facades and recessed entrances. Many of the facades are stucco, some with Mexican- or Spanish Colonial-influenced features (arches, tiling), and many others are wood-sided similar to the Cliffridge property. Some have front walls or fencing, but the majority have unfenced open front yards. A few of the neighboring existing homes are shown in Figure 4.12-4.

**Community Landmarks**

The permanent use of the Cliffridge property as office space would not result in the loss of any community landmarks. Minor interior and exterior upgrades to the existing Cliffridge property would similarly not result in the loss of any community landmarks.

The permanent use of the Cliffridge property as office space would not result in any changes to the existing architectural style. The existing visual environment of this area is shown in the lower photo in Figure 4.12-2. Landscaping and site modification that would occur with the Existing with Improvements option would not substantially alter the Cliffridge property’s architectural style, nor would it result in the loss of community landmarks. Given that the Cliffridge property conforms to the architectural style and use of building materials in the broader neighborhood, neighborhood character impacts associated with the Existing with Improvements option would be less than significant.

**4.12.4.2 Significance of Impacts**

**a. Phase 1/Phase 2**

For Phase 1/Phase 2, the bulk, scale, architectural style, and building materials would not be in contrast to adjacent development; therefore, impacts would be less than significant.
b. Existing with Improvements Option

The bulk, scale, architectural style, and building materials associated with the Existing with Improvements option would be maintained and would therefore not be in contrast to adjacent development. Impacts would be less than significant.

4.12.4.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.

4.12.5 Issue 3: Landform Alteration

Would the project result in substantial change to the existing landform?

Pursuant to the City’s Significance Determination Thresholds, impacts related to landform alteration would be significant if:

a. The project would alter more than 2,000 cubic yards of earth per graded acre by either excavation or fill, and one or more of the following conditions apply:

1) The project would disturb steep hillsides in excess of the encroachment allowance of the ESL regulations;

2) The project would create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent) slope gradient;

3) The project would result in a change in elevation of steep hillsides as determined by the City’s LDC Section 113.0103 from existing grade to proposed grade of more than five feet by either excavation or fill, unless the area over which excavation or fill would exceed five feet is only at isolated points on the site; or

4) The project design includes mass terracing of natural slopes with cut or fill slopes to construct flat-pad structures.

b. However, the above conditions may not be considered significant if one or more of the following apply:

1) The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely imitate the existing on-site landform and/or
the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through naturalized variable slopes.

2) The grading plans clearly demonstrate, with both spot elevations and contours, that the proposed slopes follow the natural existing landform and at no point vary substantially from the natural landform elevations.

3) The proposed excavation or fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot designs, and alternative retaining wall designs which reduce the project's overall grading requirements.

4.12.5.1 Impacts

a. Phase 1/Phase 2

During the Phase 1 temporary use, no physical modifications to the existing property would occur. The project site is fairly flat and level. The vacant lot appears to have been previously mass graded and not of its natural landform.

Phase 2 construction would entail approximately 3,450 cubic yards of cut and 300 cubic yards of fill, necessitating the export of 3,150 cubic yards. Landform cutting would mostly occur along the northeast edge of the lot. The project would not disturb steep hillsides, nor would it create manufactured slopes higher than 10 feet or steeper than 2:1 (50 percent) slope gradient. Although the project would result in a change in site elevation, of steep hillsides and it would not involve mass terracing of natural slopes, with no cut or fill natural steep hillsides slopes to construct flat-pad structures.

Because landform alteration would be minor, landform alteration impacts under Phase 2 would be less than significant.

b. Existing with Improvements Option

For the Existing with Improvements option, the curb cut of the existing driveway to the Cliffridge property would be widened, involving minor demolition of the existing curb and then new curb and driveway construction. Substantial alteration of the natural landform would not occur.

4.12.5.2 Significance of Impacts

a. Phase 1/Phase 2

Grading would be minor; therefore, landform alteration impacts under Phase 1/Phase 2 would be less than significant.
b. Existing with Improvements Option

Grading would be minor and landform alteration impacts under this option would be less than significant.

4.12.5.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.

4.12.6 Issue 4: Light and Glare

Would the project shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky?

Pursuant to the City’s Significance Determination Thresholds, impacts related to light and glare would be significant if:

- The project would be moderate to large in scale, more than 50 percent of any single elevation of a building’s exterior is built with a material with a light reflectivity greater than 30 percent (see LDC Section 142.07330(a)), and the project is adjacent to a major public roadway or public area.

- The project would shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.

4.12.6.1 Impacts

a. Phase 1/Phase 2

Phase 1/Phase 2 is not anticipated to shed substantial light onto adjacent, light-sensitive property or land use, nor would it emit a substantial amount of ambient light into the nighttime sky.

In Phase 2, interior and exterior lighting would be designed to comply with applicable regulations, including the City’s Outdoor Lighting Regulations (LDC, Section 142.0740) and the
LJSPD supplemental development regulations. Phase 1/Phase 2 would also be designed to meet LEED light pollution reduction criteria, as outlined in Section 3.6.1.1 of this EIR.

Exterior lighting would be designed to only light areas as required for safety and comfort while complying with all lighting requirements. Exterior parking areas, building grounds, building facades, and select landscape features would be lit at a pedestrian scale using appropriate lighting power densities. Through compliance with limits on illumination and direction, all exterior site and building luminaires would maintain safe light levels while minimizing light trespass and avoiding off-site lighting impacts. Site lighting would be minimized where possible, and technologies to reduce light pollution, such as full cutoff luminaires, low-reflectance surfaces, low-angle spotlights, installation of timers or motion-sensors, and shields or diffusers, would be utilized.

Portions of the parking area (eastern and southern parking spaces) would be bordered by a retaining wall and include a carport structure with solar photovoltaic panels on top. The partial retaining wall and landscaping combined with the solar canopy/carport would provide some shielding of headlights at night as vehicles exit the parking lot on La Jolla Scenic Way.

Phase 2 would include extensive glazing (windows or glass surfaces). Compliance with relevant development regulations concerning selection of building materials and reflective surfaces would minimize glare (i.e., light reflected off surfaces). As described in the Architectural Design and LEED design sections of the Project Description, the majority of building facades would be colored and textured or shaded/shielded to minimize reflectivity, as well as to enhance aesthetics. Roof overhangs would also help shield glazing. Most of the paved areas would be shaded by trees and other landscaping. The metal roof surfaces and building glazing have been designed to meet solar reflectivity criteria contained in LEED in order to deliberately reflect light back into the atmosphere and reduce heat island and global warming effects.

Through compliance with City lighting codes and LEED environmental design criteria, light and glare would be minimized and impacts on adjacent day and nighttime views would be less than significant.

b. Existing with Improvements Option

Under the Existing with Improvements option, no changes in lighting or window glazing would occur. Impacts would be less than significant.

4.12.6.2 Significance of Impacts

a. Phase 1/Phase 2

Given project compliance with applicable lighting regulations and LEED design criteria, light and glare impacts would not be significant for Phase 1/Phase 2.
b. Existing with Improvements Option

Under this option, no changes in lighting or window glazing would occur. Impacts would be less than significant.

4.12.6.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.
FIGURE 4.12-1
Overview of Neighborhood Characters
FIGURE 4.12-2
Existing Cliffridge Property

Source: Google Earth Images, 2010
FIGURE 4.12-3
Bulk and Scale Surveyed Residences
FIGURE 4.12-4
Existing Neighborhood Character

Bedroom Residence

Existing La Jolla Scenic Drive North Streetscape
FIGURE 4.12-5
Cul de Sac Planned for Improvement

Existing Cul de Sac Viewed from La Jolla Scenic Drive North at Cliffridge Avenue

Existing Cul de Sac Viewed from La Jolla Village Drive at Torrey Pines Road

Source: Google Earth Images, 2010
5.0 Significant Unavoidable Environmental Effects/Irreversible Changes

CEQA Guidelines Section 15126.2 (b) and (c) require that the significant unavoidable impacts of the project, as well as any significant irreversible environmental changes that would result from project implementation, be addressed in the project EIR.

5.1 Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented

In accordance with CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated but not reduced to below a level of significance despite the applicant’s willingness to implement all feasible mitigation measures, must be identified in the EIR. All significant impacts identified in Chapter 4, Environmental Analysis, of this EIR as resulting from project implementation can be reduced to below a level of significance with the mitigation measures identified in Chapter 4 and in the MMRP (Chapter 10). Thus, the project would not result in any unavoidable impacts.

5.2 Irreversible Environmental Changes Which Would Result if the Project Is Implemented

In accordance with CEQA Guidelines Section 15126.2 (c): “Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvements which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with a project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

Nonrenewable resources generally include agricultural land, mineral deposits, water resources, historic and paleontological resources, and some energy sources. As evaluated in Chapter 4, Environmental Analysis, and Chapter 8, Effects Not Found to be Significant, implementation of the project would not result in significant irreversible impacts to agricultural, mineral, historic, or paleontological resources. Implementation of the project, however, would require the irreversible consumption of natural resources and energy. Natural resource consumption would include lumber and other forest products, sand and gravel, asphalt, steel, copper, other metals, and water. Building materials, while perhaps recyclable in part at some long-term future date, would for practical purposes be considered permanently consumed. Energy derived from non-renewable sources, such as fossil and nuclear fuels, would be consumed during construction and operational lighting, heating, cooling, and transportation uses.
To minimize the use of energy, water, and other natural resources from development of Phase 1/Phase 2, the project has incorporated sustainable building practices into its site, architectural, and landscape design. As described in Section 3.5.1 of this EIR, design considerations aimed at improving energy efficiency and reducing water use have been incorporated into the project design and may serve to reduce irreversible water, energy, and building materials consumption associated with construction and occupation of the development. Because the Existing with Improvements option would maintain current levels of operations, energy, water, and use of other natural resources would be consistent with current use.
6.0 Growth Inducement

CEQA Guidelines Section 15126.2(d) requires that an EIR:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community services facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The City's 2011 Significance Determination Thresholds provide further guidance to determine potential significance for growth inducement. Based on the Thresholds, a significant impact could occur if a project would "induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment."

6.1 Population/Economic Growth

The project would provide facilities for religious use by UCSD students. No new housing would be provided and these students would reside in existing housing not related to the project. Thus, the project would not induce population growth. Furthermore, the HCJL does contain any elements that would stimulate economic growth or the need for additional housing.

6.2 Indirect Growth Inducement

The project proposes a land use that is in conformance with existing zoning and underlying community plan land use designation for the project site. The project would be located in an area already served by public infrastructure including roads, water and wastewater facilities, and transit. Because the project is located in an already urbanized area, project implementation would not remove obstacles to population growth through construction of new roads or public infrastructure in areas not currently accessible to development. Therefore, development of the project would not indirectly contribute to an incremental growth as defined by CEQA or City guidelines.
6.3 Potential for Setting Precedent

Precedent-setting actions include changes in zoning, a general plan designation, or general plan text, or the approval of exceptions to existing regulations that could provide favorable conditions for other properties to develop.

UCSD students are served by approximately 500 student organizations, of which 54 are considered “spiritual” organizations. Hillel of San Diego is organized as a 501(c)3 California nonprofit religious organization and is not registered as a student organization with UCSD. While the project is planned to serve UCSD students, it is required to be an off-campus facility due to its religious purpose.

Under the La Jolla Community Plan, the project site is currently designated as residential with “churches, temples, or buildings of a permanent nature, used primarily for religious purposes” (Municipal Code Section 1510.0303(e) [Single-Family Zone – Permitted Uses]); therefore, Hillel’s use of the project site would be consistent with that designation according to the LJSPD regulations. As discussed in Chapter 3, Project Description, Phase 1/Phase 2 would result in the development of permanent structures to be used primarily for religious purposes, and would not include a change in zoning, a general plan designation, or general plan text.

Both Phase 1/Phase 2 and the Existing with Improvements option would include deviations to existing development regulations as discussed in greater details throughout Chapters 3 and 4 of the EIR. Phase 1/Phase 2 proposes a deviation from the driveway curb cut requirements of Municipal Code during construction because the Cliffridge property would revert back to its original use upon completion of the HCJL. The Existing with Improvements option proposes a deviation from Maximum Paving and Hardscape in Residential Zones requirements of the Campus Parking Impact Overlay Zone in order to accommodate on-site parking. These deviations do not pertain to the type of use that would be allowed, but rather to the technical development regulations. As such, the requested deviations are site-specific and would not set a precedent or encourage redevelopment of surrounding properties.

While there is a potential for other UCSD student religious organizations to seek off-campus facilities in the project area, the constraints of finding a suitable site would be a limiting factor. The area in which the project is proposed is mostly developed, with UCSD and Scripps in close proximity to the project site as well as existing residential uses. Although there are small pockets of undeveloped land nearby, future development in this area is largely constrained by existing development, allowed uses, permitting and environmental review requirements, and the cost of acquiring land. Therefore, development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively.
7.0 Cumulative Impacts

Section 15130(a) of the State CEQA Guidelines requires a discussion of cumulative impacts of a project “when the project’s incremental effect is cumulatively considerable.” Cumulatively considerable, as defined in Section 15065(c), “means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” According to Section 15130 of the CEQA Guidelines, the discussion of cumulative effects “need not be provided in as great detail as is provided the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness.”

The following evaluation of cumulative impacts considers both existing and future projects in the project vicinity. For this evaluation, the project vicinity is defined as the La Jolla Community Plan area, which is bordered by University to the north, Clairemont Mesa to the east, Pacific Beach to the south, and the Pacific Ocean to the west. According to Section 15130(b)(1) of the CEQA Guidelines, the discussion of cumulative effects is to be on either (a) “a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency,” or (b) “a summary of projections contained in an adopted plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency.”

The basis and geographic area for the analysis of cumulative impacts is dependent on the nature of the issue. For this analysis, where evaluation of potential cumulative impacts are localized (e.g., noise and traffic), a list of project methods was employed. For potential cumulative impacts that are more regional in scope (e.g., greenhouse gas emissions, biological, and cultural resources), planning documents were additionally used in the analysis.

List of Projects Considered for Cumulative Analysis

The list below shows the past, present, and probable future projects considered in this cumulative effects evaluation. The development status of each cumulative project below is included, and is current as of October 2013 (the time of this writing). Figure 7-1 shows the location of each of these projects.

1. **Southwest Fisheries** project is bound by La Jolla Shores Drive on the west, north, and east sides and Shellback Way on the south, within the UCSD/SIO campus in the City of San Diego. The existing site lies along the west side of La Jolla Shores Drive and just north of the Biological Grade Driveway. The project proposes to demolish two (approximately 40,000 square feet) of the four existing structures on the west side of La Jolla Shores Drive and replace them with a new 124,000 square foot research and
development building on the east side of La Jolla Shores Drive, a net increase of 84,000 square feet. This project is approved, but not yet constructed.

2. **Scripps Hospital CUP III Expansion** project involves the demolition, renovation, and construction of new hospital and medical offices at the existing Scripps Memorial Hospital campus site within the University Community Plan Area. This project is approved.

3. **Salk Institute** is an institute for Biological Studies. This project is approved, but not yet constructed.

4. **UCSD Long-Range Development Plan** Based upon discussion with UCSD, it was determined that several potential near-term projects could be constructed and occupied by the time the proposed project comes online in 2015. These cumulative, on-campus projects include East Campus developments such as the Clinical and Technical Research Institute, East Campus Bed Tower, the Sulpizio Cardiovascular Center, and the East Campus Office Building. On the West Campus, UCSD anticipates development of additional on-campus housing units by 2015-2016.

   a. **Clinical and Technical Research Institute** is located on the UCSD East Campus Medical Center in the Health Sciences Neighborhood, sits north of the Sulpizio Cardiovascular Center and Thornton Hospital and west of the East Campus Parking Structure, above the southwest end of the north canyon which extends easterly from the I-5 corridor. The project proposes construction of a 360,000 gross square foot building providing easy access between research and clinical activities due to its proximity to the East Campus Medical Center.

   b. **East Campus Bed Tower** proposes to expand the existing Thornton Hospital by adding a bed tower with up to 245 beds.

   c. **Sulpizio Cardiovascular Center** recently opened in 2011 after completion of construction to develop a 125,000 square foot dedicated cardiovascular patient center in December 2010.

   d. **East Campus Office Building** is currently under construction to develop approximately 45,000 square feet of new space for office, administrative, and clinical research activities.

5. **Venter Institute** is located at the southwest corner of the intersection of La Jolla Village Drive and Torrey Pines Road as part of the UCSD campus. The Venter Institute is a 45,000-square foot scientific research and development center located on Parcel 4 of the Scripps Upper Mesa neighborhood within the Scripps Institute of Oceanography. The Venter Institute has revised the site plan to only provide access to Expedition Way (full access driveway). Access to Torrey Pines Road would be eliminated. The cumulative
analysis in this report assumes the trip assignment associated with the full access on Expedition Way. This project is approved, and is currently under construction.

6. **La Jolla Medical Building** is a redevelopment of the El Torito restaurant located at 8910 La Jolla Village Drive. The project proposes to construct approximately 15,000 square feet of medical office space. This project is currently under review.

7. **La Jolla Crossroads II** proposes to construct 309 multi-family residences at 9015 Judicial Drive in the Community of University City. This project is approved, but not yet under construction.

8. **Nexus Center** is located adjacent to the La Jolla Crossroads project on Judicial Drive and proposes to construct approximately 191,000 square feet of research and development office space. This project is approved, and is currently under construction.

9. **Palazzo Condominiums** proposes to construct approximately 30 multi-family residences at 2402 N. Torrey Pines Road. This cumulative project is approved, and is currently under construction.

10. **La Jolla Centre III** proposes to construct approximately 278,800 square feet of commercial office space and is located near the intersections of Judicial Drive, Executive Drive, and Town Centre Drive in the Community of University City. This project is approved, but not yet under construction.

11. **Monte Verde** proposes to construct approximately 560 multi-family residences and is located near the intersections of La Jolla Village Drive, Regents Road, and Campus Point Drive in the Community of University City. This project is approved, but is not yet constructed.

12. **Scripps Green Hospital** proposes to construct approximately 39,024 square feet of hospital land use located on Genesee Avenue north of N. Torrey Pines Road. This project is approved, but is not yet constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.

13. **9339 Genesee Executive Plaza** proposes to convert approximately 22,500 square feet of existing standard commercial office space to medical office space located at 9339 Genesee Avenue in the Community of University City. This project is approved, but is not yet constructed.

14. **Torrey Pines Glider Port Expansion** proposes to expand the operations of the existing City Park (glider port) located at 2800 Torrey Pines Scenic Drive in the Community of La Jolla. This project is approved, but is not yet constructed.

15. **UTC Revitalization Project** is a master planned development plan with variable development programs that can respond to changing market conditions and desire of the
community of University City. The original project proposed up to 750,000 square feet retail and 250 dwelling units with several alternative project scenarios based on a trip generation equivalency. The intent is to allow flexibility in the development program while ensuring the alternative project scenarios have been addressed by the analysis of the original project. This project is approved, and is partially completed and open.

16. La Jolla Commons III CPA proposes land use changes to the current plan for a mixed-use development of a 450,000–square-foot mid-rise office building, a 25-story residential tower with 120 units, a 325-room hotel, other general office development (mainly for scientific research), and open space. The amendment would eliminate the residential uses to increase the Development Intensity Element of the University Community Plan designating this portion of the site to develop as office use, a hotel, or a mix of hotel and office use. The project is bound by Executive Drive, La Jolla Village Drive, and Judicial Drive. One mid-rise office building tower of the project is completed and partially occupied. This cumulative project has been approved by the City, with the exception of the proposed changes to eliminate the residential uses in the CPA.

**Plans Considered for Cumulative Effects Analysis**

This cumulative analysis relies on regional planning documents and associated CEQA documents to serve as an additional basis for the analysis of the broader, regional cumulative effects of the project, such as air quality and GHG emissions. The regional planning documents used in this analysis include SANDAG’s Regional Comprehensive Plan and the City General Plan. For technical issues such as air quality and biology, regional planning documents such as the SDAPCD Regional Air Quality Strategy, multiple state and local guidance documents concerning GHG emission reductions (see Section 4.6.1.2 City CAP, and the MSCP were used. These plans are discussed in Section 2.6 and throughout Chapter 4 of this EIR, and are incorporated by reference in the appropriate sections of the cumulative analysis below.

### 7.1 Land Use

As a general rule, and as stated in the City’s Significance Determination Thresholds for land use, projects that are consistent with the applicable community or specific plan and are compatible with surrounding land uses should not result in significant land use impacts. Phase 1/Phase 2 is proposed on a residential site that allows “churches, temples, or buildings of a permanent nature, used primarily for religious purposes” (Municipal Code Section 1510.0303(e) [Single-Family Zone – Permitted Uses]). As the facility is intended to foster religious growth and study for Jewish college students, the project is consistent with current planning regulations and documents.

Phase 1/Phase 2 has been designed to provide space for programs considered essential to the Jewish religion and Jewish identity and living. Under Phase 1/Phase 2, a right-of-way vacation is proposed to allow use of unutilized land and enhance the pedestrian environment along with
the construction of sidewalks and landscaping features in place of the cul-de-sac and a wider parkway strip between the sidewalks and La Jolla Scenic Drive North. Typically, cumulative impacts associated with deviations from land use regulations would result if they are permanent and would contribute to such effects as the degradation of community character. The deviation from Driveway Curb Cut Requirements is requested in order to bring the project into better scale with the residential character of the neighborhood. The proposed deviation is temporary and would not result in secondary environmental effects, such as traffic safety impacts. The parking area with the 12-foot-wide curb cut would be used by the Hillel staff members. Thus, due to the temporary nature of the deviation and the low amount of vehicles using the lot, this deviation would not result in significant cumulative environmental effects.

Phase 1/Phase 2 would result in significant impacts to biological resources, paleontological resources, and noise. After the incorporation of mitigation measures, these impacts would be less than significant. Past projects have contributed, and planned/future projects would contribute, to localized and regional effects on GHG emissions, biological and cultural resources, and traffic, as a result of land uses. The project’s direct contribution to these cumulative effects is evaluated below, and would be the same as those identified in Chapter 4.

Based on the limited construction to the Cliffridge property proposed under the Existing with Improvements option, impacts were determined to be less than significant.

### 7.2 Traffic/Circulation/Parking

As discussed in Section 4.2, Traffic/Circulation/Parking, the TIA prepared for Phase 1/Phase 2 includes an analysis of the existing, existing plus near-term, and Year 2030 traffic impacts both in terms of direct and cumulative effects. The identified cumulative traffic effects resulting from project implementation would be negligible and would not reduce the level of service at any of the intersections or street segments.

For the Existing with Improvements option, there are virtually no changes in the delay and V/C ratio between with the current zoning and with improvements analyses under existing conditions. Thus, the same results would be expected under the near-term cumulative conditions. It can therefore be concluded that no significant direct or cumulative impacts would be expected with the Existing with Improvements option.

### 7.3 Biological Resources

Preservation of the region’s biological resources has been addressed through the implementation of regional habitat conservation plans. Impacts to biological resources in the City are managed through the adopted MSCP Subarea Plan which is also part of the adopted General Plan. The La Jolla Community Plan also provides protection measures and policies related to the protection of natural areas and dedicated open space. As discussed in Section 4.3, Biological Resources, the vacant site associated with Phase 1/Phase 2 has been previously
disturbed as a result of past grading activities and residential development. Phase 1/Phase 2 would not result in cumulative impacts to plant or wildlife species because the project would be developed in an urbanized area of the City on a site identified as developed and disturbed land. Potential impacts to raptors and nesting migratory birds from construction during Phase 1/Phase 2 would be mitigated to below a level of significance. As discussed in Section 4.3, Biological Resources, the project site is not within or adjacent to a City MHPA; therefore, development of the site would not result in cumulative impacts to any City MHPA. In addition, there are no Tier I, Tier II, Tier IIIA, or Tier IIIIB habitats on the vacant site. Overall, no cumulative impacts would occur under Phase 1/Phase 2.

The Existing with Improvements option involves minor grading and interior upgrades. The Existing with Improvements option would result in the loss of a single ornamental tree in order to construct the new parking lot. This option would not require substantial clearing or grading or result in excessive construction noise affecting off-site resources. There would be no cumulative impacts to sensitive plant or wildlife species, nor would this option result in cumulative impacts to the City MHPA.

7.4 Geology and Soils

As discussed in the geologic reconnaissance report prepared for Phase 1/Phase 2 and Section 4.4 of this EIR, there are no geologic hazards on the vacant site. Phase 1/Phase 2, as with all other projects in the City, would follow standard construction practices and engineering codes to ensure no geologic impacts would result from project development.

Similar to Phase 1/Phase 2, potential impacts from future development would be reduced through implementation of remedial measures required by the City’s Grading Regulation for all new development within the City. In addition, conformance to building construction standards for seismic safety with the Uniform Building Code would assure that new structures would be able to withstand anticipated seismic events. Therefore, implementation of Phase 1/Phase 2 and associated future development in the subregion would not contribute to cumulative impacts related to geology and soils.

Similarly, the construction activities associated with the Existing with Improvements option would follow standard construction practices and engineering codes, and would be required to comply with the grading ordinance. As such, this option would not contribute to cumulative impacts related to geology and soils.

7.5 Energy Use and Conservation

The area of projects that would be considered for the energy conservation cumulative effects analysis is defined as the San Diego region. As discussed in Section 4.5, Phase 1/Phase 2 would achieve a minimum 15 percent improvement in energy efficiency over the previous building code by incorporating design measures (related to electricity, natural gas, and water
use) and building in accordance with CalGreen. Given the energy efficient design in accordance with mandated energy efficiency standards, Phase 1/Phase 2 would not result in the use of excessive amounts of electricity, natural gas, or water during its long-term operation.

The Existing with Improvements option does not involve major modifications or expansion of the existing building operations or performance, and energy use would be similar to current levels. Therefore, the project’s contribution to regional energy demand would not be considered cumulatively significant.

### 7.6 Greenhouse Gases

Global climate change is, by nature, a cumulative issue; however, it is addressed in its own section within the EIR (Section 4.6). As discussed therein, GHG emissions due to Phase 1/Phase 2 would be less than the 900 metric ton screening threshold. The analysis concluded that the project’s contribution to statewide emissions would be less than significant. Furthermore, the GHG-reducing design features for the project would ensure that the project does not conflict with local or state policies and plans, including the City CAP, that aim to reduce GHG emissions.

Modifications to convert the Cliffridge property from temporary to permanent use under the Existing with Improvements option would not expand or intensify the existing building operations or vehicle traffic. Therefore, the Existing with Improvements option would also not generate GHG emissions in excess of 900 MT. Thus, impacts associated with the project’s contribution of GHGs to cumulative statewide emissions would be less than significant.

### 7.7 Historical Resources

As addressed in Section 4.7 of this EIR, the archaeological survey and testing program did not result in the discovery of any archaeological sites or features. However, three isolated artifacts were collected from the surface of the project area. No cultural deposits were located and no historic sites or structures were identified within the project area. In addition, no religious or sacred uses were identified within the project area. As the project would not directly impact cultural resources, there would be no contribution to a cumulative impact from either Phase 1/Phase 2 or the Existing with Improvements option.

### 7.8 Noise

In the project vicinity, cumulative noise impacts would generally be attributed to increases in traffic volumes. The noise analysis conducted for this EIR used cumulative traffic volumes identified for area roads. As such, the project noise analysis provides a cumulative analysis as well.
Section 4.8 of this EIR evaluated the potential effects of noise from increases in traffic on area roadways. An increase of 3 dB is considered to result in a perceptible increase in noise, and in cases where existing noise levels already exceed applicable noise guidelines, a project-related increase of 3 dB may be considered significant. An increase in 3 dB would result from a doubling of the traffic volume on a roadway. The noise analysis in Table 7-1 shows that on a cumulative basis, Phase 1/Phase 2 would not elevate noise levels above 3 dB, which means that there would not be a noticeable increase in noise. Because the Existing with Improvements option would not expand or intensify existing operations, this option would not elevate noise levels. Therefore, cumulative impacts would be less than significant.

<table>
<thead>
<tr>
<th>Roadway</th>
<th>Existing ADT</th>
<th>Existing Plus Project ADT</th>
<th>Increase in dB*</th>
<th>Cumulative without Project ADT</th>
<th>Cumulative Plus Project ADT</th>
<th>Cumulative Increase without Project in dB</th>
<th>Total Increase in Cumulative with Project in dB</th>
<th>Project Contribution in dB*</th>
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<td>44,810.0</td>
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<td>1,351.0</td>
<td>0.1</td>
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</tr>
</tbody>
</table>

*Due to the certified accuracy of noise modeling, noise levels should be reported as whole decibels, thus the noise levels level changes presented at this level of detail are for informational purposes only.

7.9 Paleontological Resources

The City requires mitigation measures to address the potential for impacts to paleontological resources. These measures are applied to development projects within geologic formations that have a high and moderate potential for fossils throughout the City and include monitoring during grading, collection, and report preparation. All discretionary projects within the project area and throughout the City would be reviewed to determine the likelihood of paleontological resources. Implementation of the mitigation measures noted above would also reduce cumulative impacts to below a level of significance.

Furthermore, the project-level mitigation measures would reduce the contribution to cumulative cultural resource from Phase 1/Phase 2 impacts to a less than significant level. With implementation of an approved monitoring program, the project’s contribution to cumulative impacts would be less than cumulatively considerable, and thus not significant. The project-
specific mitigation measures would require monitoring, collection, recordation, and curation and
documentation of any significant resources. The Existing with Improvements option would not
involve excavation or grading of geologic formations at a depth of 10 feet or greater where
fossils could occur. Therefore, the project would not considerably contribute to the loss of
significant paleontological resources.

7.10 Hydrology

As discussed in Section 4.10 of this EIR, Hydrology, the project would not substantially or
adversely impact existing drainage patterns, increase runoff, or create flood hazards on-site or
downstream. Development of Phase 1/Phase 2 would involve features such as pervious pavers
in the outdoor areas and parking lot and other LID and IMPs that would minimize impervious
areas and promote on-site retention and infiltration for storm water runoff. These LID features
on the project site would preclude potential hydrology impacts by reducing the flow and volume
of runoff.

For the Existing with Improvements option, the proposed parking lot would be in a location
where the garage and deck were once located; thus, there would not be a substantial increase
in impervious surfaces. The project would therefore not contribute to any cumulative hydrologic
effects in the project area due to cumulative project development. Other projects would be
similarly mandated to adhere to state and local engineering requirements and regulations on
runoff, drainage, and water quality.

7.11 Water Quality

Phase 1/Phase 2 has been designed to comply with existing regulations protecting water quality
and a SWPPP that sets forth construction and permanent, post-construction BMPs to minimize
water quality impacts both during the construction and operation phase of the project would be
prepared. Future projects would also be required to implement these mandated water quality
protection measures, and through adherence to the City’s NPDES permit, SUSMP, and
Stormwater Standards Manual, would prepare project-specific storm water pollution prevention
plans and implement practices that would preclude significant water quality impacts.
Implementation of these requirements would avoid potentially significant cumulative impacts.
Because the paved parking lot associated with the Existing with Improvements option is
proposed in a location where the garage and deck were once located, there would not be a
substantial increase in impervious surfaces and associated runoff. Therefore, cumulative
impacts from implementation of this option would also be less than significant.

7.12 Visual Effects and Neighborhood Character

The project would comply with relevant height, bulk, and coverage regulations. The site plan,
arquitecture, and scale of the project have been designed in consideration of the residential
character of the adjacent neighborhood. As the site is partially vacant, Phase 1/Phase 2 would
result in a change in the visual character of the existing site, but the change would not be considered adverse or incompatible with surrounding uses, as discussed in Section 4.12 of this EIR. The project would provide an enhanced pedestrian environment and connectivity through pathways and landscaping. Landscaping and partial retaining walls would also screen the parking area. The proposed architecture and landscape plan for Phase 2 would be varied in form, material, and color to avoid a monotonous visual environment, while also maintaining unity and blend in with the preferred materials and character of the neighborhood structures. Because the Existing with Improvements option proposes only minor modifications to the Cliffridge property, this option would also maintain the existing visual environment. Therefore, impacts would not be adverse and the project would not result in potentially significant cumulative impacts.
8.0 Effects Found Not to be Significant

Pursuant to CEQA Guidelines Section 15128, this section briefly describes the environmental issue areas that were determined during preliminary project review not to be significant, and were therefore not discussed in detail in the EIR.

8.1 Agricultural Resources

The project site is located within an existing developed residential neighborhood. The project site is not known to have historically supported agricultural operations and does not contain prime agricultural soils or farmlands as designated by the California Department of Conservation. The project site is not subject to, nor near, a Williamson Act contract parcel. Neither the Phase 1/Phase 2 project nor the Existing with Improvements option would not impact agricultural resources.

8.2 Mineral Resources

Neither the Phase 1/Phase 2 project nor the Existing with Improvements option would not result in the loss of availability of valuable known mineral resources or of a locally important mineral recovery site as identified in the City General Plan or the La Jolla Community Plan. The project site is located within Mineral Resource Zone Three (MRZ-3), as identified in the General Plan’s Generalized Mineral Land Classification map (General Plan, Figure CE-6), which indicates areas containing mineral deposits, the significance of which cannot be evaluated from available data. Pursuant to the City’s Significance Determination Thresholds for mineral resources, because the project site has been previously graded, is currently developed in urban uses, is not currently being mined, and is too small to support an economically feasible mineral resource extraction operation, the Phase 1/Phase 2 project and the Existing with Improvements option would have no effect on mineral resources.

8.3 Air Quality/Odor

Air emissions would result from construction and operation of Phase 1/Phase 2, which would generate 58 ADT. Emissions for Phase 1/Phase 2 were calculated using the URBEMIS 2007 model. As a worst-case assumption, the analysis was based on construction beginning in January 2012 and lasting for approximately one year. Primary inputs were the numbers of each piece of equipment and the length of each construction stage.

Tables 8-1 and 8-2 summarize the construction and operational emissions that would result from the project. As shown, emissions are projected to be less than the applicable thresholds for all pollutants.
Normal construction activity is not typically considered to be an odor source. Odors generated from vehicles and/or equipment exhaust during construction of the project would be temporary, localized, and occur at levels that would not affect people. Upon completion of construction activities, there would be no pollutant emissions from operation of the project. Because the Existing with Improvements option would not expand operations or staff, emissions would be consistent with current levels. Emissions related to GHG emissions from construction and operation of the project are discussed in Section 4.6.
8.4 Public Services/Facilities

Phase 1/Phase 2 includes the HCJL Student Center, the Library/Chapel, and the Professional Leadership Building. Under the Existing with Improvements option, construction of permanent on-site parking and other improvements are proposed to bring the Cliffridge property into compliance with the Municipal Code. The Phase 1/Phase 2 project does not include housing or any other component that would reasonably be expected to generate a population increase. As a result, there would be no corresponding increase in demand for public services or facilities. Therefore, no impact to public services would occur under either the Phase 1/Phase 2 project or the Existing with Improvements option.

8.5 Parks and Recreation

As a religious facility, neither the Phase 1/Phase 2 project or the Existing with Improvements option would result in an increased demand for recreational resources, or increase the use of existing neighborhood or regional recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Neither the Phase 1/Phase 2 project nor the Existing with Improvements option would require that recreational facilities be constructed; thus, no impact to recreational resources would occur.

8.6 Utilities and Service Systems

Neither the Phase 1/Phase 2 project nor the Existing with Improvements option would not involve increased housing or any other component that could reasonably be expected to generate a population increase. As a result, there would be no increase in demand for utilities or service systems, including water supply, wastewater (septic/sewer), and solid waste.

8.7 Hazardous Materials and Public Health

Compliance with applicable federal, state, and local regulations would reduce the potential for accidental hazardous substance spills during construction for the Phase 1/Phase 2 project and the Existing with Improvements option; thus, the impacts related to hazardous materials would be less than significant. Similarly, operation of the Phase 1/Phase 2 project and the Existing with Improvements option would not result in any health risks associated with the use of generation of hazardous materials.

A regulatory database search was conducted and no hazardous material sites were found on the project site (or within ¼ mile of the project site). Therefore, no impacts associated with hazardous materials would occur as a result of the project.
8.8 Population and Housing

Neither the Phase 1/Phase 2 project nor the Existing with Improvements option would not involve increased housing or any other component that could reasonably be expected to generate a population increase; nor would either result in a population change or demand for housing. No impacts to population or housing would occur.
9.0 Project Alternatives

In order to fully evaluate the environmental effects of projects, CEQA mandates that alternatives to the project be analyzed. Section 15126.6 of the CEQA Guidelines requires the discussion of “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” and the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to “focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project,” even if these alternatives would impede to some degree the attainment of the project objectives. As discussed in Section 4.0, Phase 1/Phase 2 could result in significant, direct, and/or cumulative environmental impacts related to biological resources, paleontological resources, and noise. Mitigation measures have been identified that would reduce all direct and cumulative impacts to below a level of significance.

In developing the alternatives to be addressed in this chapter, consideration was given regarding their ability to meet the basic objectives of the Phase 1/Phase 2 and eliminate or substantially reduce significant environmental impacts. As identified in Section 3.2, objectives of Phase 1/Phase 2 include the following:

- Fulfill the religious mission of the HCJL by providing a facility for learning, community-building, and spiritual counseling that nurtures the religious, spiritual, and intellectual growth of Jewish students at UCSD.

- Provide a permanent religious space in a centralized location for Jewish students at UCSD which, because of separation of church and state issues, cannot be built on the UCSD campus but is located close to UCSD to serve students where they live and attend classes.

- Contribute to the longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses on a property owned and maintained by Hillel for use by UCSD students.

- Provide a consolidated location with enough space for programs and activities and offices for religious leaders.

- Contribute to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus and transit connections.

- Enhance the pedestrian access, orientation, and walkability of the area surrounding the project site.
9.0 Project Alternatives

- Enhance the religious, spiritual, and community-building activities through the design and character of indoor and outdoor spaces.

- Implement the sustainable development goals through the installation of sustainable design features and building practices that would achieve optimal water conservation, on-site renewable energy, natural daylighting and ventilation, and a reduction in vehicle use through enhanced bicycle and pedestrian facilities. Exceed City goals to reduce waste and conserve regional landfill space by incorporating design measures that satisfy LEED criteria for 75 percent diversion (reuse, recycling) of construction and operational waste.

The alternatives identified in this section are intended to further reduce or avoid significant environmental effects of Phase 1/Phase 2. The Existing with Improvements Alternative option is also an alternative to the Phase 1/Phase 2 project, but was analyzed at an equal level of detail throughout the EIR. The EIR also addresses alternatives considered but rejected, as well as the No Project Alternative, the Reduced Project Footprint on Vacant Parcel Alternative, and the alternate location known as the Site 675 Alternative. Each major issue area included in the impact analysis of this EIR has been given consideration in the alternatives analyses.

As required under Section 15126.6 (e) (2) of the CEQA Guidelines, the EIR must identify the environmentally superior alternative. Pursuant to the CEQA Guidelines, if the No Project Alternative is determined to be the most environmentally superior project, then another alternative among the alternatives evaluated must be identified as the environmentally superior project. Section 9.5 addresses the Environmentally Superior Alternative.

9.1 Alternatives Considered but Rejected

9.1.1 Alternate Land Use

The option of developing the existing vacant land portion of the project site as a community park to serve the surrounding residential neighborhood was considered. However, this alternative would not meet any of the project objectives discussed above. Development of the project site as a community park would not provide a central location for Hillel to fulfill its mission of “nurturing the religious, spiritual, and intellectual growth of Jewish students at UCSD in a pluralistic setting through community building, Jewish learning and spiritual counseling.” In addition, it would not provide staff offices and meeting space for religious programs nor maximize the opportunities for religious study, meditation, inspiration, and community-building activities through the design and character of indoor and outdoor spaces. Furthermore, the City does not own the project site; it is privately owned. For these reasons, alternative land use was not considered further.
9.1.2 Alternate Location

According to the CEQA Guidelines (Section 15126.6 (f) (2) (A):

The key question and first step in (alternative location) analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

Consistent with the La Jolla Community Plan, the project site was selected for development of office and meeting space used for religious activities. In order to accomplish the objectives of the project, it would be necessary to identify an alternative site of comparable size (approximately 6,500 square feet of office space or 1.39 acres for design-build) which is appropriately designated and zoned for single-family residential in the LJSPD, which allows buildings for religious purposes. In addition, an alternate location would need to be within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus. While there may be other sites that meet these criteria, they are not in the applicant’s ownership.

Several alternate location options were analyzed for feasibility by MarketPoint, as discussed below.

**Acquiring a Vacant Lot in the Area**

The corner of Genesee and La Jolla Village Drive is a vacant multi-acre site owned by Garden Communities that is currently planned for four high-rise residential towers. The site would be suitable for a Hillel facility, but is planned for development and is not available for the project.

There are two other vacant sites in the area, both at Judicial Drive and Executive Drive to the east of Genesee Avenue. One site is being planned for a high-rise hotel or combination condominium/hotel, and the other is designated scientific/research. Neither of these sites is appropriate for a Hillel facility because they have differing designated land uses and are too distant (2.25 miles) from campus. Thus, neither of these vacant sites would be within a convenient and walkable distance to activities in the southern portion of the UCSD campus. For these reasons, acquiring a vacant lot in the area of the project was not considered further.

**Leasable Facilities, Flex Space for Sale, and Shared Space**

The potential for leasing available office space within walking distance of campus was also considered. The feasibility study identified five properties ranging between 4,000 and 6,000 square feet within one-mile of UCSD. However, leasing available office space in the area would not meet the project objective of providing a permanent religious facility on property owned by Hillel. Leasing space would also not provide the environment conducive to religious
study and meditation or accomplish the same design goals and character of indoor and outdoor spaces outlined in the project objectives.

Purchasing flex space was considered but rejected because there are currently no office/flex (multi-purpose) spaces available within a reasonable distance of campus. The largest blocks of multi-purpose space for sale are in Otay Mesa and in the Carlsbad/San Marcos areas. Relocating the project to one of these available areas would not meet the project objective of contributing to regional goals to reduce vehicle use and promote walkability by providing a facility within a convenient and walkable (1/4 mile) distance to activities in the southern portion of the UCSD campus. In addition, it would not provide a religious space in a centralized location for Jewish students at UCSD.

The option of sharing space with the three Jewish institutions within walking distance of the UCSD campus (Beth El Synagogue, Adat Yeshurun Synagogue, and the Jewish Community Center) was also considered. However, all three venues have exhausted their supply of usable land and therefore would not be able to accommodate the programs and religious offices for staff proposed by the Hillel facility.

For these reasons, the alternative locations discussed above were not considered further. One alternative, Site 675, was determined to be a possible site for the Phase 1/Phase 2, and is discussed in Section 9.2.4 below.

9.2 Alternatives Fully Analyzed

9.2.1 Existing with Improvements Alternative Option

As described throughout the EIR, under this alternative, Hillel would permanently use the Cliffridge property to provide religious programs for Jewish students at UCSD including meetings, one-on-one counseling, and administrative offices. This would involve bringing the Cliffridge property up to all applicable code requirements for the intended religious use and occupancy and would include demolishing the existing attached garage, patio, and a tree in order to construct a paved surface parking lot. The programming offered at the permanent Cliffridge location would be of the same type as that proposed for the Phase 1/Phase 2 project, however, at a smaller scale. Use the Cliffridge property to provide for religious programs in the existing residential structure on a permanent basis. Permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the Municipal Code would be required for the permanent use. This would involve construction of permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the Municipal Code for this use. Modifications would be completed to the interior of the structure, but the existing architectural design would remain intact. Additional—except for the parking improvements to accommodate parking would be required. The impact analysis for the Existing with Improvements option, although analyzed.
throughout the EIR, is summarized here. Discretionary actions required to implement the Existing with Improvements Alternative include a SDP for development within the LJSPD.

The Existing with Improvements Alternative would require the following discretionary action to be considered by the San Diego City Council (Decision Process Five) after a formal recommendation by the Planning Commission: An SDP for development within the LJSPD for proposed driveway and parking improvements. A Deviation from Parking Regulations from the minimum requirements would also be included in the SDP. The Existing with Improvements Alternative would provide six standard parking spaces (one as handicap-accessible) in a new surface parking lot with a new driveway connecting to the existing cul-de-sac. This would also involve the construction of a new pedestrian curb ramp on Cliffridge Avenue, which would provide access to the existing walkway at the front (east) of the residential structure. The on-site parking would be adequate to alleviate an additional need for parking on nearby streets in the project area. Figure 9-1 shows the Existing with Improvements site plan.

Additional details of this alternative include the following:

**a. Operations**

Religious programming under the Existing with Improvement Alternative would be similar to the Phase 1/Phase 2 proposal offering the same activities as noted above, albeit at a smaller degree based on capacity.

Hours of operation would likewise be the same.

**b. Parking**

The Existing with Improvements Alternative would include a request for a parking deviation as described above. The alternative would provide six standard parking spaces (one as handicap-accessible) in a new surface parking lot with a new driveway connecting to the existing cul-de-sac (see Figure 9-1). Based on similar analysis of the parking surveys prepared for comparable Hillel facilities, a total of six on-site spaces would be included within the Cliffridge project site.

**c. Demolition, Grading and Construction**

Construction includes demolition of the existing patio and garage, laying a new parking lot, and enhancing the landscaping, and would last approximately three to six months total, and would require no more than five workers per day. In accordance with City regulations and permit conditions, workers would need to park at an off-site location and be shuttled into the site. One ornamental tree in the rear of the Cliffridge property near the existing retaining wall would also be removed to accommodate the parking lot. The driveway curb cut of the existing driveway would be widened and relocated to bring the Cliffridge property up to the applicable code requirements for the intended permanent use. This would involve minor demolition to the existing flare ends of the existing driveway curb cut, some minor fine grading, and then new curb construction. No other grading or construction actions would be required.
d. Access and Circulation

Vehicular access for the Existing with Improvements Alternative would continue to be taken from the cul-de-sac along La Jolla Scenic Drive North. A new 24-foot-wide concrete driveway would replace the existing driveway. This driveway would lead to the new parking lot. Pedestrian access to the Cliffridge property would be taken from Cliffridge Avenue, where a new pedestrian ramp would be constructed (at the eastern portion of the property line) in front of the property. The other ADA-compliant curb ramp at the intersection of Cliffridge Avenue and La Jolla Scenic Drive North would remain. All sidewalks surrounding the Cliffridge property would remain.

9.2.1.1 Land Use

The Existing with Improvements Alternative option would have similar land use impacts as the Phase 1/Phase 2 project. Like the Phase 1/Phase 2 project, this alternative would require a SDP with a deviation from minimum parking requirements for development according to the LJSPD and a deviation. The deviations for both Phase 1/Phase 2 and Existing with Improvements would not result in direct or secondary physical environmental effects. Furthermore, both Phase 1/Phase 2 and Existing with Improvements would not result in a significant land use conflict, as both would be permitted uses in this single-family zone. Therefore, land use-related impacts would be less than significant and similar to Phase 1/Phase 2.

a. Parking Regulations

The permanent parking plan for the Existing with Improvements Alternative is designed to accommodate parking along the western edge of the site, facing Torrey Pines Road, and screened by the existing wall on the perimeter of the site. A total of six parking spaces would be included; one of which would be van accessible and would include a marked walkway to the offices. The additional parking paving would be provided as part of the driveway redesign that would locate a longer driveway from the existing garage location at the back of the lot along the north side of the residential structure out to Cliffridge Avenue. The proposed design would provide landscaping features to sufficiently screen the hardscape areas.

The intent of the parking plan is to maintain the character of the residential zone. The Cliffridge property is the last residence towards the northwestern edge of the single-family subdivision, bordered by Torrey Pines Road, La Jolla Scenic Drive North, Cliffridge Avenue, and a single-family residence to the south. The Cliffridge property is not in a highly visible area (i.e., in the middle of the neighborhood surrounded by other residences). The parking area would be shielded from view along Torrey Pines Road by existing walls and from the adjacent single-family residence by landscaping. Vehicles entering the lot would do so from the cul-de-sac west of Cliffridge Avenue. Thus, the
deviation would not significantly alter the character of this residential area. Impacts would be less than significant.

b. **Land Use Compatibility**

Because only minor modifications are proposed to the Cliffridge property, the Existing with Improvements Alternative would not conflict with the applicable goals and objectives of the General Plan and La Jolla Community Plan. The Cliffridge property is not located on an environmentally sensitive area, coast/shoreline, or steep hillside; therefore, elements of the community plan and ordinance most relevant to the project are related to the residential character of the project site. The design and exterior of the property is compatible with adjacent residential units and would remain the same; thus, this alternative would not conflict with the La Jolla Shores Design Manual. Because the Existing with Improvements Alternative would not conflict with the environmental goals, objectives, and recommendations in the General Plan or the La Jolla Community Plan, no impact would result.

Except for the requested deviation related to minimum parking requirements, the Existing with Improvements Alternative would comply with all zoning and applicable Municipal Code and development regulations. Impacts would be less than significant.

c. **Comparison of Land Use Impacts**

Overall, impacts associated with regulatory consistency and land use compatibility under the Existing with Improvements Alternative would be similar compared to the project.

9.2.1.2 **Transportation/Circulation/Parking**

a. **Local Street System**

In order to develop the baseline condition for the Existing with Improvements Alternative, the existing traffic volumes were adjusted to account for the current use of the Cliffridge property operating as the Hillel facility. The existing traffic counts used in this report were collected while the Cliffridge property functioned as a Hillel center. Therefore, the existing baseline scenario under this alternative would need to reflect the traffic volumes that would be generated by a single-family residence. Given the Cliffridge property would be approximately 25 percent of the gross square footage of the Phase 1/Phase 2 project, 75 percent of the project-generated traffic was deducted from the existing traffic volumes.

In order to estimate the traffic that would be generated from the current zoning of the Cliffridge property, the City trip rate for a “single-family detached” home was calculated. The Cliffridge property would be expected to generate nine ADT with one AM peak hour trip (0 inbound/1 outbound) and one PM peak hour trip (1 inbound/0 outbound). The trips generated by
the use of the Cliffridge property at its current zoning as a single-family residence was added to arrive at the Existing with Current Zoning condition (baseline condition). The current Hillel facility traffic volumes (estimated as 25 percent of the Phase 1/Phase 2 project) were added to the existing baseline condition to arrive at Existing with Improvements traffic volumes.

Tables 9-1 and 9-2 show the Existing with Improvements Alternative intersection and segment operations compared to the baseline condition, respectively. The analysis results for the Existing with Improvements Alternative are virtually the same, if not better, as compared to the existing conditions associated with the proposed project. Since there are virtually no changes in the delay and V/C ratio between with the current zoning and with improvements analyses under existing conditions, the same results would be expected under both the near-term and Year 2030 cumulative conditions. It can therefore be concluded that no significant direct or cumulative impacts would be expected with the Existing with Improvements Alternative.

**TABLE 9-12**

**EXISTING WITH IMPROVEMENTS ALTERNATIVE – INTERSECTION OPERATIONS**

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<th>Intersection</th>
<th>Control Type</th>
<th>Peak Hour</th>
<th>Existing With Current Zoning</th>
<th>Existing With Improvements</th>
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<td></td>
<td></td>
<td></td>
<td>Delay(^a)</td>
<td>LOS(^b)</td>
</tr>
<tr>
<td>1. La Jolla Village Drive/</td>
<td>Signal</td>
<td>AM</td>
<td>21.6</td>
<td>C</td>
</tr>
<tr>
<td>Torrey Pines Road</td>
<td></td>
<td>PM</td>
<td>33.1</td>
<td>C</td>
</tr>
<tr>
<td>2. La Jolla Village Drive/</td>
<td>Signal</td>
<td>AM</td>
<td>15.2</td>
<td>B</td>
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<td>La Jolla Scenic Way</td>
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<td>PM</td>
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<td>C</td>
</tr>
<tr>
<td>3. La Jolla Scenic Drive</td>
<td>OWSC</td>
<td>AM</td>
<td>8.6</td>
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<tr>
<td>North/ Cliffridge Way</td>
<td></td>
<td>PM</td>
<td>8.6</td>
<td>A</td>
</tr>
<tr>
<td>4. La Jolla Scenic Way/</td>
<td>OWSC</td>
<td>AM</td>
<td>14.1</td>
<td>A</td>
</tr>
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<td></td>
<td>PM</td>
<td>12.2</td>
<td>B</td>
</tr>
<tr>
<td>5. La Jolla Scenic Drive</td>
<td>Uncontrolled</td>
<td>AM</td>
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<td>North/ Caminito Deseo</td>
<td></td>
<td>PM</td>
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</tr>
</tbody>
</table>

\(^a\)Average delay expressed in seconds per vehicle  
\(^b\)Level of Service  
\(^c\)Increase in delay due to project  
\(^d\)OWSC – One-Way Stop Controlled intersection. Minor street delay reported.

Likewise, construction activities associated with the Existing with Improvements Alternative would be minor, including the construction of the parking area and curb cut. These improvements would take approximately three to six months, and would require no more than five workers per day. In accordance with City regulations and permit conditions, workers would need to park at an off-site location and be shuttled into the site. Work would typically be limited to between the hours of 8:30 a.m. and 3:30 p.m. Construction impacts would be less than significant.
### TABLE 4.2-429-2
**EXISTING WITH IMPROVEMENTS OPTION ALTERNATIVE – SEGMENT OPERATIONS**

<table>
<thead>
<tr>
<th>Street Segment</th>
<th>Functional Classification</th>
<th>LOS E Capacity</th>
<th>Existing With Current Zoning</th>
<th>Existing With Improvements</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>ADT</td>
<td>LOS</td>
</tr>
<tr>
<td>La Jolla Village Drive</td>
<td></td>
<td></td>
<td>32,566</td>
<td>D</td>
</tr>
<tr>
<td>Expedition Way to Torrey Pines Road</td>
<td>4-Ln Major Arterial</td>
<td>40,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Torrey Pines Road to La Jolla Scenic Way</td>
<td>6-Ln Major Arterial</td>
<td>45,000</td>
<td>44,785</td>
<td>E</td>
</tr>
<tr>
<td>La Jolla Scenic Way to Gilman Drive</td>
<td>6-Ln Prime Arterial</td>
<td>60,000</td>
<td>49,200</td>
<td>C</td>
</tr>
<tr>
<td>Torrey Pines Road</td>
<td></td>
<td></td>
<td>26,739</td>
<td>E</td>
</tr>
<tr>
<td>La Jolla Village Drive to Glenbrook Way</td>
<td>4-Ln Collector</td>
<td>30,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>La Jolla Scenic Way</td>
<td></td>
<td></td>
<td>10,084</td>
<td>D</td>
</tr>
<tr>
<td>La Jolla Village Drive to La Jolla Scenic Drive North</td>
<td>2-Ln Collector</td>
<td>15,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>La Jolla Scenic Drive North</td>
<td></td>
<td></td>
<td>1,350</td>
<td>≥ C</td>
</tr>
<tr>
<td>Cliffridge Avenue to La Jolla Scenic Way</td>
<td>Sub-Collector</td>
<td>2,200</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*aCity of San Diego Roadway Capacity Standards.
*bAverage Daily Traffic volumes.
*cLevel of Service
*dVolume to Capacity ratio.
*eLa Jolla Scenic Way has a curb-to-curb width varying between 75-85 feet with a striped center median. Therefore, a capacity of 15,000 was used in the analysis.
*fNon Circulation Element Residential Collector capacity of LOS C threshold of 2,200 was utilized.
*gLa Jolla Village Drive between Torrey Pines Road and La Jolla Scenic Way is classified as and built to six-lane Major Arterial standards, with the exception of a raised center median. Therefore, the average capacity between a four-lane and six-lane Major Arterial was used.
b. Parking

Because there would be no increase in operations at the Cliffridge property, existing and projected traffic conditions would remain the same under this alternative, and no additional trips on the area roadways would occur. All street segments, with the exception of Torrey Pines Road between La Jolla Village Drive and Glenbrook Way (LOS E), and all key signalized intersections would continue to operate at an acceptable LOS. Based on the traffic analysis completed for the project, there would be four City roadways operating at LOS E or worse in the near-term and 2030 condition with or without the project. Therefore, traffic-related impacts would remain the same under Existing with Improvements. The Existing with Improvements Alternative includes a deviation from minimum parking requirements and would provide six standard parking spaces (one as handicap-accessible) in a new surface parking lot with a new driveway connecting to the existing cul-de-sac. The Existing with Improvements Alternative would provide adequate parking for the proposed use.

c. Traffic Hazards

The new pedestrian curb ramp would be constructed on Cliffridge Avenue towards the front of the Cliffridge property. This improvement would ensure that traffic hazards to motor vehicles, pedestrians, and bicycles would be less than significant.

d. Comparison of Traffic Impacts

Overall, traffic impacts associated with increased traffic, parking and traffic hazards under the Existing with Improvements Alternative would be similar compared to the proposed project.

9.2.1.3 Biological Resources

The Phase 1/Phase 2 project would reduce impacts to raptors and nesting birds to a less than significant level through implementation of mitigation measures requiring avoidance of the breeding season. Under the Existing with Improvements Alternative, there would be minor construction activities which would not disrupt raptors or breeding or nesting birds. With only minor disturbance to biological resources under Existing with Improvements, impacts would be less than significant, and impacts would be less than Phase 1/Phase 2.

a. Sensitive Species

Because project components associated with the Existing with Improvements Alternative would occur on a developed site with ornamental landscaping, no impacts to sensitive plant species would occur.

One ornamental tree in the rear of the Cliffridge property near the existing retaining wall would be removed to accommodate the parking lot. Although there is a potential for raptors to nest in nearby large eucalyptus trees, trees on the Cliffridge property would remain. Construction
activities for the on-site parking lot would involve demolition of the garage and patio and laying asphalt for a new parking lot. With the limited use and type of construction equipment combined with the short-term nature of construction required for a parking lot, impacts to raptors would be less than significant and no mitigation would be required.

b. **Sensitive Habitats**

There are no activities proposed under this alternative that would affect an area considered biologically sensitive. Therefore, no impacts would occur.

c. **Comparison of Impacts to Biological Resources**

Overall, with only minor disturbance to biological resources under the Existing with Improvements Alternative, impacts would be less than significant, and impacts would be less than Phase 1/Phase 2 proposed project.

### 9.2.1.4 Geologic Conditions

Geologic conditions at the project site would remain unchanged under Existing with Improvements Alternative. According to the geotechnical investigation, the native formational materials at the site are generally suitable for the support of low- to mid-rise structures. While impacts would be less than significant under either Phase 1/Phase 2 or Existing with Improvements, because there would be only minor construction activities, impacts would be considered less than Phase 1/Phase 2.

a. **Geological Hazards**

Like the proposed project, construction activities would be required to meet applicable regulations and standards, which would be verified before a grading permit is issued. Impacts associated with geologic hazards would be less than significant.

b. **Soil Erosion**

Like the proposed project, this alternative would not alter the site in a manner that would increase on- or off-site erosion, as all activities would comply with the grading ordinance. As such, impacts would be less than significant.

c. **Comparison of Impacts to Geological Conditions**

Overall, impacts to geological conditions under the Existing with Improvements Alternative would similar compared to the project.
9.2.1.5 Energy Conservation

The Existing with Improvements Alternative would result in a minor increase in the consumption of electricity, natural gas, or gasoline over existing conditions due to minor construction activities. Implementation of the Existing with Improvements Alternative would involve bringing the existing residential structure into compliance with local building codes, but would not involve major modifications or expansion of the existing building operations or performance. Below is a comparison of the electricity consumption between the Existing with Improvements and Phase 1/Phase 2.

a. Electricity

Phase 1/Phase 2 would construct three new buildings with a GFA of 6,479 square feet. The total electricity consumption, after implementation of energy efficiency standards and design measures, would be 30,855 to 43,197 kWh per year. The Cliffridge house has a GFA of 1,792 square feet and was constructed in 1958. Based on a study of household power usage in southern California (Silverman 2007), the average 1,500-square-foot single-family residence uses approximately 6,000 kWh in electricity per year. That number was based on an average of three full-time residents in a household. Conservatively, it can be assumed that the Cliffridge property under Existing with Improvements Alternative would use approximately 10,000 kWh per year. Therefore, electricity use under this alternative would be less than the proposed project. While impacts would be less than significant under either Phase 1/Phase 2 or Existing with Improvements, due to reduced square footage it can be reasonably assumed that energy usage would be considered less under the Existing with Improvements option.

b. Fuel and Other Forms of Energy

The Existing with Improvements Alternative would not result in expansion of the existing structure or operations. There would be no increases in natural gas consumption, water use, solid waste, or vehicle use would result from the permanent operation at the Cliffridge property. Therefore, this alternative would not result in new or excessive uses of fuel or other energy.

Overall, the energy consumption from the Existing with Improvements Alternative would be less than the proposed project; however, neither scenario would reduce the available supply of energy resources below a level considered sufficient to meet the City’s needs or cause a need for new and expanded facilities.

c. Comparison of Impacts to Energy Conservation

Due to the reduced size of this alternative compared to the proposed project, energy impacts associated with the Existing with Improvements Alternative would be less than the proposed project.
9.0 Project Alternatives

9.2.1.6 Greenhouse Gases

The conversion of the Cliffridge property from temporary to permanent use for Hillel would not expand or intensify the existing building operations or vehicle traffic. Design features would be consistent with the City CAP. Therefore, like the proposed project it would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. Phase 1/Phase 2 is estimated to generate a worst-case total of 181.09 MTCO₂E of GHG emissions each year. By accounting for the project design that includes on-site solar energy, and by accounting for vehicle emissions reductions anticipated by 2020 through state regulations, Phase 1/Phase 2 is projected to generate 132.66 MTCO₂E each year by 2020.

Under Existing with Improvements, there would be no new uses generating traffic or consuming electricity and water (major causes of GHG emissions). On a local basis, this alternative would contribute a minor amount of GHG emissions to the region in excess of the existing baseline condition due to minor construction activities. However, construction activities would be temporary, the Existing with Improvements option would have less than significant impacts, and impacts would be considered less than Phase 1/Phase 2.

Comparison of Impacts to GHG

Overall, GHG related impacts associated with the Existing with Improvements Alternative would be similar compared to the proposed project.

9.2.1.7 Historical Resources

The archaeological study indicates that no significant prehistoric, historic, or cultural resources are present within the project site, and none are anticipated. In addition, there are no known religious or sacred uses on-site or within the immediate vicinity of the project site. Therefore, as with Phase 1/Phase 2, no impacts to historical resources would occur under Existing with Improvements. Overall, impacts would be similar as Phase 1/Phase 2.

a. Prehistoric/Historic Resources and Human Remains

No cultural deposits were located and no historic sites or structures or known burial sites or cemeteries were identified. Similar to Phase 1/Phase 2, the potential for unanticipated discovery or the disturbance of human remains is low. In the unlikely event of the discovery of human remains during project grading, all contractor and City staff are required to adhere to California Health and Safety Code Section 7050.5. This section of the Health and Safety Code requires no further disturbance to occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98.

In regards to historical resources, the City’s Historical Resource Guidelines are used for determining significance under CEQA to reflect a local perspective of historical, architectural, and cultural importance for inclusion on the City’s Historical Resources Register.
9.0 Project Alternatives

The Cliffridge property is more than 45 years old, and thus has been evaluated for its historic significance in relation to the City’s Historical Resource Guidelines. The residence and garage at the Cliffridge property do not meet any of the criteria (see Appendix F-2). Therefore, the Cliffridge property would not be eligible for inclusion on the City’s Historical Resources Register.

In addition to determining the significance of a property under Historical Resource Guidelines criteria, a property must also must possess integrity. Integrity is defined by the NRHP as the “ability of a property to convey and maintain its significance.” The local, state, and national registers recognize seven aspects of integrity—location, design, setting, materials, workmanship, feeling, and association. The Cliffridge property is not directly linked to any historic events, activities, persons, past time, or past place. As a result, the property does not possess, nor has it ever possessed, an associative element for integrity purposes (see Appendix F-2).

The Cliffridge property does not meet any of the City’s Historical Resource Guidelines criteria, nor does it possess an associative element for integrity purposes. Impacts to historical resources under the Existing with Improvements Alternative would therefore be less than significant.

b. **Religious/Sacred Uses**

As with Phase 1/Phase 2, implementation of the Existing with Improvements Alternative would result in less than significant impacts to religious and sacred uses.

c. **Comparison of Impacts to Historical Resources**

Impacts to Historical Resources associated with the Existing with Improvements Alternative would be similar compared to the proposed project.

9.2.1.8 **Noise**

Noise generation under the Existing with Improvement Alternative would be less than the proposed project due to the reduced nature of events and facility size compared to the proposed project. Additionally, traffic volumes would not increase with the Existing with Improvements Alternative to the same degree as the proposed project.

a. **Ambient Noise Level Increase**

**On-site Generated Noise**

On-site noise generation associated with the Existing with Improvements Alternative would be consistent with existing measured noise levels. Impacts would be less than significant.
Construction Noise

Construction noise associated with the minor grading for the new surface parking lot and new driveway connection for the Existing with Improvements Alternative would not be of a duration or level that would exceed City standards. Impacts would be less than significant.

Groundborne Vibration/Noise

This alternative would not generate groundborne vibration or noise.

b. Traffic Noise

Exterior Noise

Under this alternative, a paved parking lot would be constructed where the existing garage and patio are located. Therefore, there would be no exterior use areas under the Existing with Improvements Alternative. This alternative would not result in the exposure of people to current or future traffic noise.

Interior Noise

As shown in Figure 4.8-3, the 70 CNEL noise contour extends to the immediate north of the Cliffridge property, running parallel with La Jolla Village Drive. The existing barrier on Torrey Pines Road, as well as the house south of Cliffridge property, was modeled in order to determine the future noise levels. The interior noise levels were measured to exceed 65 CNEL on the Cliffridge property site. The City conservatively assumes that standard construction materials will provide a 15 dB reduction of exterior noise levels to an interior receiver. With these criteria, it can be assumed that the Cliffridge property would have interior noise levels of 50 CNEL, resulting in a significant impact.

The following mitigation measures would be implemented as part of the Existing with Improvement Alternative:

NOS-1 Prior to the issuance of building permits, a detailed acoustical analysis shall demonstrate that interior noise levels within the Cliffridge property due to exterior sources would be at or below the 45 CNEL standard.

Possible interior noise attenuation measures include using windows and doors with greater noise reduction properties, installing insulation, or isolating plumbing components. The exterior to interior noise reduction provided by the building structure is partially a function of the STC values of the windows and doors used in the building. The greater the STC value, generally the greater the noise reduction. The necessary STC values required to reduce interior noise levels to 45 CNEL or less, which may range from STC 25 to STC 35 for window and door components, would be determined as a part of the required interior noise analysis. The applicant’s
9.0 Project Alternatives

final building plans shall identify all recommendations of the acoustical report, including STC ratings of windows and doors, ventilation requirements, insulation, plumbing isolation, etc. Final building plans shall be reviewed by the City’s Acoustical Plan Checker to verify that the mitigation measures recommended in the acoustical report have been incorporated.

NOS-2 The design for the buildings shall include a ventilation or air conditioning system to provide a habitable interior environment when windows are closed.

Implementation of the mitigation measures identified above would ensure that interior noise levels would not exceed the 45 CNEL standard. Impacts would be mitigated to a level that is less than significant, similar to the proposed project.

c. Comparison of Noise Impacts

While mitigation would be required to reduce interior noise impacts, due to reduced size of the facility under this alternative, noise impacts associated with the Existing with Improvements Alternative would be less than the proposed project.

However, noise levels due to existing traffic would exceed 65 CNEL on the Cliffridge property site. Noise-sensitive interior spaces have an interior standard of 45 CNEL. The City conservatively assumes that standard construction materials will provide a 15-dB reduction of exterior noise levels to an interior receiver. With these criteria, it can be assumed that the Cliffridge property would have interior noise levels of 50 CNEL; hence, interior noise levels could exceed 45 CNEL, resulting in a significant impact. Phase 1/Phase 2 would also result in a potentially significant impact to interior spaces. With implementation of mitigation detailed in Section 4.8, impacts under both Existing with Improvements and Phase 1/Phase 2 would be reduced to less than significant. Therefore, impacts under Existing with Improvements would be the same as Phase 1/Phase 2.

9.2.1.9 Paleontological Resources

Minor grading would occur under the Existing with Improvements Alternative; however, grading operations under this alternative would not exceed the City’s volume and depth thresholds for both moderate and high paleontological sensitivity areas. Specifically, the Existing with Improvements Alternative would not involve grading exceeding the 1,000- and 2,000-cubic-yard thresholds for high and moderate paleontological sensitivity areas, respectively.

Comparison of Impacts of Paleontological Resources

Implementation of this alternative would not entail major grading which could disrupt fossils. Impacts associated with paleontological resources would be less than the proposed project.
Thus, there would be little to no potential to uncover subsurface paleontological resources. Any existing undiscovered resources, if present, would remain buried. Construction activities associated with Phase 1/Phase 2 would have the potential to result in significant impacts to paleontological resources as a result of grading activities. Phase 1/Phase 2 would require mitigation during construction to ensure the recovery of any resources. However, under Existing with Improvements, there would not be any loss of resources. Because there would be less grading and little to no potential to discover paleontological resources under the Existing with Improvements option, impacts are considered less than Phase 1/Phase 2.

### 9.2.1.10 Hydrology

Like the proposed project, construction activities under the Existing with Improvement Alternative would be required to meet applicable regulations and standards related to the maintenance of hydrologic flow rate from the project site to off-site storm drain systems. Post development BMPs reducing increased runoff resulting from new impervious surfaces flows would be required. Conformance with storm water regulations would assure that current drainage patterns on the vacant site associated with Phase 1/Phase 2 would remain unchanged under the Existing with Improvements option. The paved surface parking lot and new driveway connection proposed under this alternative would not result in a substantial increase in storm water runoff volume or flow rate.

And the basins serving the vacant site have sufficient capacity to handle current flows. Phase 1/Phase 2 would not substantially alter on- and off-site drainage patterns. Runoff volume and flow rates associated with Phase 1/Phase 2 conditions would increase slightly over the current condition, but would not be considered significant. Under developed conditions, flows would be directed into four drainage basins appropriately sized to handle calculated flows from the project, thereby avoiding significant hydrology impacts.

While impacts would be less than significant under both Phase 1/Phase 2 and the Existing with Improvements option, because there would be no change in hydrology under this alternative, impacts would be considered less than Phase 1/Phase 2.

**Comparison of Impacts to Hydrology**

Implementation of this alternative would not result in increased storm water volume or run-off. Impacts associated with Hydrology would be similar compared to the proposed project.

### 9.2.1.11 Water Quality

Like the proposed project, the Existing with Improvement Alternative would be required to implement construction BMPs in accordance with the performance standards in the City’s Storm Water Standards Manual. These measures would assure that new construction would not result in any measurable increase of pollution in runoff from the site. Water quality conditions on the vacant site associated with Phase 1/Phase 2 would remain unchanged if the Existing with
Improvements option were implemented. The receiving waters for the project area are identified on the state’s current list of impaired waters. The Existing with Improvements option would not result in any increase to pollutants which would further impair these waters. In accordance with stormwater quality regulations, Phase 1/Phase 2 Specifically, the Existing with Improvements Alternative would be required to incorporate low-impact design, as well as source and structural BMPs, as needed which would likely lessen or altogether avoid water quality impacts.

While impacts would be less than significant under either Phase 1/Phase 2 or the Existing with Improvements option, because there would be no change to the site that would result in an increase in pollutant discharge or impairments to water quality under this alternative, impacts would be considered less than Phase 1/Phase 2.

**Comparison of Impacts to Water Quality**

Implementation of this alternative would not result in increased polluted runoff. Impacts associated with water quality would be similar compared to the proposed project.

**9.2.1.12 Visual and Neighborhood Character**

Compared to Phase 1/Phase 2 proposed project, the Existing with Improvements Alternative would lessen result in less visual changes because the currently vacant portion of the project site would remain unchanged.

**a. Development Features**

**Organized Appearance**

The Existing with Improvements Alternative would comply with all relevant City codes. The appearance of the Cliffridge property that comprises the Existing with Improvements Alternative is well organized. It is a one-story structure with a detached garage, a large landscaped front and backyard, and perimeter. A photograph of the front of the Cliffridge property is shown in Figure 4.2-12.

Modifications to the site for the Existing with Improvements Alternative would include interior structural upgrades, landscaping, redesign of the driveway, and construction of a parking lot and a new 24-foot-wide driveway cut on Cliffridge Avenue north of the Cliffridge property. These modifications would comply with the aesthetic elements of all City codes, including the design guidelines of the LJSPD.

**Height, Bulk, and Coverage Consistency**

The building height of the residential structure on the Cliffridge property would remain the same. The building coverage would also remain the same and would be consistent with the LDC and LJSPD and would not exceed 60 percent of the lot. The Existing with Improvements Alternative would comply with all other relevant development and design regulations.
Visible Walls

The existing wall at the property boundary would remain intact. The Existing with Improvements Alternative would not involve any crib or retaining walls or any unscreened noise walls greater than 6 feet in height and 50 feet in length.

Varied Visual Environment

The Existing with Improvements Alternative would not create a monotonous visual environment. As shown in Figure 4.12-2, the appearance of the residential structure on the Cliffridge property is varied, with an articulated front façade, recessed door entrance, protruding front window, and varied, sloped roofline. Trees and shrubbery on the corners of the lot provide variety and balance to the front lawn.

Under this alternative, the Cliffridge property would be modified on the interior, the utility pole (shown in the right of the upper photo in Figure 4.12-2) would be moved and the utility line undergrounded, a new curb cut, a driveway would be paved along the northerly edge of the lot next to the tree and shrubbery shown in the right corner of the upper photo in Figure 4.12-2 (which would remain), and landscaping would be provided along the north edge of the lot. Similar to existing site conditions, this landscaping would be composed of a variety of drought-tolerant plant species in varying heights, shapes, and colors. The resulting visual environment would not be monotonous.

However, Phase 1/Phase 2 would also have no significant visual impacts, as it would utilize building materials consistent with the adjacent uses and result in improved landscaping similar to that found in the surrounding residential uses. Overall, visual impacts associated with development features would be less than significant under the Existing with Improvements Alternative.

b. Neighborhood Character

Bulk and Scale

The bulk and scale of the Cliffridge property is typical of the adjacent neighborhood. The Existing with Improvements Alternative would consist of minor interior and exterior upgrades, none of which would generate any change in bulk or scale relative to the surrounding neighborhood.

Architectural Style and Building Materials

The Cliffridge property is a one-story, clapboard-sided, rambling style, three-bedroom, two-bath house built in 1958 (see Figure 4.12-2). The adjacent houses on Cliffridge Avenue and east along La Jolla Scenic Drive North are also mostly one-story, each different than the next, but of similar vintage and rambling ranch house or cottage silhouette with large front and rear yards, hence an emphasis on landscaping features. All have pitched overhanging roofs, and some
have bay or protruding windows. Most have articulated front facades and recessed entrances. Many of the facades are stucco, some with Mexican- or Spanish Colonial-influenced features (arches, tiling), and many others are wood-sided similar to the Cliffridge property. Some have front walls or fencing, but the majority have unfenced open front yards. A few of the neighboring existing homes are shown in Figure 4.12-4.

**Community Landmarks**

The permanent use of the Cliffridge property would not result in the loss of any community landmarks. Minor interior and exterior upgrades to the existing Cliffridge property would similarly not result in the loss of any community landmarks.

The permanent use of the Cliffridge property would not result in any changes to the existing architectural style. The existing visual environment of this area is shown in the lower photo in Figure 4.12-2. Landscaping and site modification that would occur with the Existing with Improvements Alternative would not substantially alter the Cliffridge property’s architectural style, nor would it result in the loss of community landmarks.

Given that the Cliffridge property conforms to the architectural style and use of building materials in the broader neighborhood, neighborhood character impacts associated with the Existing with Improvements Alternative would be less than significant.

c. **Landform Alteration**

For the Existing with Improvements Alternative, the curb cut of the existing driveway to the Cliffridge property would be widened, involving minor demolition of the existing curb and then new curb and driveway construction. Substantial alteration of the natural landform would not occur.

d. **Light and Glare**

Under the Existing with Improvements Alternative, no changes in lighting or window glazing would occur. Impacts would be less than significant.

e. **Comparison of Visual Impacts**

Overall, visual impacts associated with the Existing with Improvements Alternative would be less than significant, but due to the smaller development footprint, impacts would be less than the proposed project.

**9.2.1.13 Conclusion of Feasibility Related to the Existing with Improvements Alternative**

Implementation of the Existing with Improvements Alternative would result in fewer significant impacts than the proposed project. Under this alternative, impacts associated with land use,
the proposed project. This alternative would avoid significant and mitigated impacts associated with biology and paleontological resources. Although less than significant, the degree of impacts associated with energy and visual resources would be less than the proposed project.

While creating a permanent space for the Hillel facility, this alternative would not meet most of the project objectives. It would not provide adequate space to enhance community building activities through useable indoor and outdoor space. The Existing with Improvements Alternative would not enhance pedestrian and bicycle access in the neighborhood, and would not implement sustainable building goals.

9.2.2 No Project Alternative

The following discussion of the No Project Alternative is based on the CEQA Guidelines Section 15126.6 (e) (3) (B), which states:

If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this no project consequence should be discussed. In certain instances, the No Project Alternative means “no build” wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve existing physical environment.

Further, according to Section 15126.6 (e) (3) (C):

After defining the No Project Alternative . . ., the lead agency should proceed to analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Under the No Project Alternative, the Cliffridge house would revert to a single-family use. No new construction or changes to the building and/or building pad would occur. Another No Project Alternative pursuant to CEQA would be the continuation of the existing condition. Under this scenario, the Cliffridge property would continue to operate as a Hillel facility with the code violation removed. For this scenario, improvements would be required to bring the Cliffridge
structure up to code to support the use. This would be in essence to the Existing With Improvements Alternative. See Section 9.2.1 for a detailed discussion.

Under the No Project Alternative, existing conditions on the project site would be retained. Unlike Phase 1/Phase 2 or Existing with Improvements option, no new improvements would occur. As such, there would be no new impacts. The No Project Alternative would not meet major project objectives to provide a permanent religious space in a centralized location for Jewish students at UCSD; contribute to the longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses; provide a consolidated location with enough space for programs and activities and offices for religious leaders; enhance the pedestrian access, orientation, and walkability within the project site; or enhance the religious, spiritual, and community building activities through the design and character of indoor and outdoor spaces. Furthermore, the No Project Alternative would not maximize use of land owned by the applicant or provide the enhanced pedestrian environment and inviting entrance to the community as compared to the Phase 1/Phase 2 project.

9.2.2.1 Land Use

Under the No Project Alternative, no improvements are proposed would occur. The Cliffridge property would revert to a single-family residence, which is an allowed use in the zone. The code violation would be removed from the site, existing land uses would remain. The code violation related to the site use would require resolution with the City, but land use-related impacts would be less than significant and similar to Phase 1/Phase 2.

Comparison of Impact to Land Use

Under the No Project Alternative, the proposed use would be allowed under the zone. Impacts would be similar compared to the proposed project.

9.2.2.2 Transportation/Circulation/Parking

Existing and projected traffic conditions would remain unchanged under the No Project Alternative with the continuation of the existing use because only no limited additional trips associated with single-family use on the area roadways would occur. All street segments, with the exception of Torrey Pines Road between La Jolla Village Drive and Glenbrook Way (LOS E), and all key signalized intersections would continue to operate at an acceptable LOS. Based on the traffic analysis completed for the project, there would be four City roadways operating at LOS E or worse in the near-term and 2030 condition without the project. This condition would not change under this alternative. Traffic-related impacts would be less than significant. The V/C ratio increase due to the Phase 1/Phase 2 project on the street segments operating at LOS E does not exceed the City’s threshold. Therefore, traffic-related impacts would remain the same with or without Phase 1/Phase 2.
Comparison of Traffic Impacts

Under the No Project Alternative, traffic patterns would remain unchanged and no roadways would degrade to exceeding allowable LOS. Impacts would be similar compared to the proposed project.

9.2.2.3 Biological Resources

The proposed project would reduce impacts to raptors and nesting birds to a level less than significant through compliance with mitigation measures detailed in Section 4.3, Biological Resources. Under the No Project Alternative, there would be no clearing and no construction activities; therefore, short-term disruption to raptors and breeding or nesting birds would not occur and impacts would be less than significant. Because there would be no disturbance to biological resources under the No Project Alternative, construction-related impacts would be avoided and would be less than Phase 1/Phase 2.

Comparison of Impacts to Biological Resources

Because there would be no disturbance to biological resources under the No Project Alternative, impacts would be less than the proposed project.

9.2.2.4 Geologic Conditions

Geologic conditions at the project site would remain unchanged under the No Project Alternative. According to the geotechnical investigation, the native formational materials at the site are generally competent and suitable for the support of low- to mid-rise structures. Therefore, impacts under the proposed project would be less than significant. The No Project Alternative does not propose construction and would likewise result in less than significant impacts to geological conditions. While impacts would be less than significant under either the project or the No Project Alternative, because there would be no development of the site under the No Project Alternative, impacts would be considered less than Phase 1/Phase 2.

Comparison of Impacts to Geological Conditions

Impacts would be similar compared to the proposed project.

9.2.2.5 Energy Conservation

Although the Phase 1/Phase 2 project incorporates an energy efficient design (i.e., energy-efficient three-coat stucco exteriors; energy-efficient lighting; renewable energy designs; and high-efficiency window glazing) in accordance with mandated energy efficiency standards, the No Project Alternative would not result in an increase in the consumption of electricity, natural gas, or gasoline compared to the proposed project due to the reduced intensity of use. Additionally, no construction would occur under this alternative, over existing conditions.
because no new or altered uses would be introduced. Therefore, there would be no impacts to energy resources as a result of this alternative.

Phase 1/Phase 2 incorporates an energy-efficient design (i.e., energy-efficient three-coat stucco exteriors; energy-efficient lighting; and high-efficiency window glazing) in accordance with mandated energy efficiency standards. In addition, Phase 1/Phase 2 includes on-site renewable energy in the form of solar photovoltaic panels on top of the carport structures in the surface parking lot, which would supply 30 to 50 percent of the on-site energy demand. As such, the Phase 1/Phase 2 would not result in the use of excessive amounts of electricity during its long-term operation.

While impacts would be less than significant under either Phase 1/Phase 2 or the

**Comparison of Impacts to Energy Conservation**

Due to the absence of construction and the reduced intensity of use under the No Project Alternative, because there would be no development of the site under the No Project Alternative, impacts would be considered less than the Phase 1/Phase 2.

### 9.2.2.6 Greenhouse Gases

Phase 1/Phase 2 is estimated to generate a worst-case total of 123.36 MTCO$_2$E of GHG emissions each year. By accounting for the project design that includes on-site solar energy, and by accounting for vehicle emissions reductions anticipated by 2020 through state regulations, Phase 1/Phase 2 is projected to generate 94.89 MTCO$_2$E each year by 2020.

Under the No Project Alternative, the use would be consistent with relevant land use plans and therefore consistent with the City CAP. There would be no new uses generating traffic or consuming electricity and water (major causes of GHG emissions). On a local basis, the No Project Alternative would not add any new GHG emissions would be added to the region in excess of that considered in the CAP, e-existing baseline condition.

**Comparison of Impacts to Greenhouse Gases**

Therefore, while Phase 1/Phase 2’s level of impacts would be less than significant, Impacts associated with this alternative would be less than the Phase 1/Phase 2.

### 9.2.2.7 Historical Resources

The archaeological study indicates that no significant prehistoric, historic, or cultural resources are present within the project site and none are anticipated. In addition, there are no known religious or sacred uses on-site or within the immediate vicinity of the project site. Therefore, as with Phase 1/Phase 2, n
Comparison of Impacts to Historical Resources

No impacts to historical resources would occur under the No Project Alternative. Overall, impacts would be similar as compared to the Phase 1/Phase 2 project.

9.2.2.8 Noise

The No Project Alternative would not result in significant impacts associated with noise generation because it would not result in noise levels above the threshold of significance.

Comparison of Noise Impacts

Due to the reduced intensity of use under this alternative, noise generation under the No Project Alternative would be less than the proposed project. Under the No Project Alternative, existing use of the site would remain unchanged; therefore, no increase in traffic or area noise would occur compared to the Phase 1/Phase 2, which would generate an increase in traffic and associated noise. Because there would be no increase in noise levels under the No Project Alternative, impacts would be less than significant and less than the Phase 1/Phase 2.

9.2.2.9 Paleontological Resources

In the absence of grading under the No Project Alternative, there would be no potential to uncover subsurface cultural resources. Any existing undiscovered resources would remain buried. Construction activities associated with Phase 1/Phase 2 would have the potential to result in significant impacts to paleontological resources as a result of grading activities. Although Phase 1/Phase 2 would require mitigation during construction to ensure the recovery of any resources, under the No Project Alternative there would not be any potential loss of resources.

Comparison of Impacts to Paleontological Resources

Therefore, impacts to paleontological resources would be Because there would be no grading under the No Project Alternative, impacts are considered less than the Phase 1/Phase 2 project.

9.2.2.10 Hydrology

Current drainage patterns on the vacant site associated with Phase 1/Phase 2 would remain unchanged under the No Project Alternative and the basins serving the vacant site have sufficient capacity to handle current flows. No construction is proposed under the No Project Alternative. It would not Phase 1/Phase 2 would not substantially alter on- and off-site drainage patterns.

Runoff volume and flow rates associated with Phase 1/Phase 2 conditions would increase slightly over the current condition, but would not be considered significant. Under developed
conditions, flows would be directed into four drainage basins appropriately sized to handle calculated flows from the project, thereby avoiding significant hydrology impacts.

**Comparison of Impacts to Hydrology**

While impacts would be less than significant under either the Phase 1/Phase 2 project or the No Project Alternative, because there would be no change in hydrology under this alternative, impacts would be considered less than the Phase 1/Phase 2 project.

### 9.2.2.11 Water Quality

Water quality conditions on the vacant site associated with Phase 1/Phase 2 would remain unchanged with the No Project Alternative. The receiving waters for the project area are identified on the state's current list of impaired waters. The No Project Alternative would not result in any new construction that could increase runoff pollutants, which would further impair these waters. In accordance with stormwater quality regulations, Phase 1/Phase 2 would incorporate low-impact design, as well as source and structural BMPs, which would likely lessen or altogether avoid water quality impacts.

**Comparison of Impacts to Water Quality**

While impacts would be less than significant under either the Phase 1/Phase 2 or the No Project Alternative, because there would be no change in water quality under this alternative, impacts would be considered less than the Phase 1/Phase 2 project.

### 9.2.2.12 Visual and Neighborhood Character

Compared to Phase 1/Phase 2, the No Project Alternative would result in less visual changes to the project site because no new construction is proposed. The Cliffridge residence would remain in its current condition and no development on the adjacent vacant site would occur. The currently vacant portion of the project site would remain unchanged. However, Phase 1/Phase 2 would also have no significant visual impacts, as it would utilize building materials consistent with the adjacent uses and result in improved landscaping similar to that found in the surrounding residential uses. Overall,

**Comparison of Visual Impacts**

Visual impacts associated with the No Project Alternative would be less under the No Project Alternative than the proposed project.

### 9.2.2.13 Conclusion of Feasibility Related to the No Project Alternative

The No Project Alternative would not meet any project objectives to provide a permanent religious space in a centralized location for Jewish students at UCSD; contribute to the
longevity, stability, and financial feasibility of the local Hillel organization by providing a dedicated space for religious uses; provide a consolidated location with enough space for programs and activities and offices for religious leaders; enhance the pedestrian access, orientation, and walkability within the project site; or enhance the religious, spiritual, and community-building activities through the design and character of indoor and outdoor spaces. Furthermore, the No Project Alternative would not maximize use of land owned by the applicant or provide the enhanced pedestrian environment and inviting entrance to the community as compared to the Phase 1/Phase 2 project. It is therefore rejected as infeasible.

9.2.3 Reduced Project Footprint on Vacant Parcel Alternative

The intention of the Reduced Project Footprint on Vacant Parcel Alternative is to decrease the development footprint on the vacant parcel in order to reduce significant biological, noise, and paleontological impacts associated with the Phase 1/Phase 2. Under this alternative, the development footprint for new construction would be reduced to approximately 1.34 acres (by approximately 33 percent reduction). This alternative would be 6,099 square feet of GFA (the Cliffridge house is 1,792 square feet; on the vacant site, one building would be 2,494 square feet of GFA without the second floor, and the other would be 1,813 square feet of GFA). Compared to the Phase 1/Phase 2 project (6,479 square feet of GFA), this would represent a reduction of 380 square feet.

By reducing the development footprint from three to two new structures, this alternative would accommodate fewer people, which would reduce the parking demand, thereby requiring less surface parking than the Phase 1/Phase 2. The reduction in parking needed under this alternative would increase the amount of open space on-site and would provide an increase in the open space for the landscape plan.

Under this alternative, the existing residential structure at the Cliffridge property would be converted to permanent office use for Hillel and brought up to all applicable code requirements for the intended use and occupancy. Modifications to the residence would be to the interior, and the existing architectural design would remain intact. The Reduced Project Alternative would construct two one-story buildings similar in design and utilize similar building materials as the existing single-family residences in the area. As with the Phase 1/Phase 2, the cul-de-sac would be vacated and landscaped with native trees and shrubs to screen the residence/office from the sidewalk and La Jolla Village Drive. In addition, the courtyard/inner yard area would be increased over the Phase 1/Phase 2 project and landscaped with native and drought-tolerant trees, shrubs, and groundcover. A comparative analysis of the impacts associated with this alternative and the Phase 1/Phase 2 project is provided below.
9.2.3.1 Land Use

Land use impacts under the Reduced Project Footprint on Vacant Parcel Alternative would be similar to those of the Phase 1/Phase 2. While this alternative would reduce the development footprint compared to Phase 1/Phase 2, it would maintain the same religious use that is allowed within the zone. This alternative would not conflict with any other relevant land use plan or policy. Impacts overall land use impacts would be the same as Phase 1/Phase 2 and would be less than significant.

Comparison of Impacts to Land Use

Because this alternative proposes the same allowable use as the proposed project and would conform to all land use plans and policies, impacts to Land Use under the Reduced Project Footprint on Vacant Parcel Alternative would be similar compared to the proposed project.

9.2.3.2 Transportation/Circulation/Parking

As with Phase 1/Phase 2, under this alternative, the cul-de-sac would be vacated and La Jolla Scenic Drive North would be reconfigured as a curve into Cliffridge Drive. In addition, all street segments projected to operate at LOS E or worse in the near-term and Year 2030 condition would remain deficient with or without either the reduced project or Phase 1/Phase 2.

Comparison of Traffic Issues

Overall, no change in traffic patterns or worsening of LOS would occur under this alternative. Impacts under the Reduced Project Footprint on Vacant Parcel Alternative would be similar when compared to the Phase 1/Phase 2 project.

9.2.3.3 Biological Resources

As with the Phase 1/Phase 2 project, short-term disruption to raptors and breeding or nesting birds would occur under this alternative as a result of construction activities. This alternative would be required to implement mitigation measures similar to those identified for the Phase 1/Phase 2 to reduce impacts to below a level of significance.

Comparison of Impacts to Biological Resources

Overall, impacts under the Reduced Project Alternative would be the same as similar compared to the Phase 1/Phase 2 project.

9.2.3.4 Geologic Conditions

Geologic conditions on the vacant site associated with Phase 1/Phase 2 would pose the same constraints on development of this alternative due to its location in a seismically active area.
These constraints would be addressed through specific measures and design considerations contained in the geotechnical investigation and City ordinances resulting in a less than significant impact associated with geological conditions.

**Comparison of Impacts to Geological Conditions**

As such, impacts from geologic hazards associated with the Reduced Project Alternative would be the same as the Phase 1/Phase 2 project.

### 9.2.3.5 Energy Conservation

Like the Phase 1/Phase 2 project, this alternative would incorporate energy efficient design measures (related to electricity, natural gas, and water use) and would be built in accordance with CalGreen for new structures. However, the Reduced Project Footprint on Vacant Parcel Alternative would decrease the development footprint by one-third over that of Phase 1/Phase 2, which would translate into a slightly decreased demand for electricity, natural gas, and gasoline. As with Phase 1/Phase 2, this alternative would incorporate energy efficient design measures (related to electricity, natural gas, and water use) and would be built in accordance with CalGreen for new structures. The Cliffridge property would be used under this alternative, which would not have the same energy-efficient design measures. Overall, it can be reasonably assumed that this alternative would have similar energy use rates to Phase 1/Phase 2.

**Comparison of Impacts to Energy Conservation**

Due to the reduced size of this alternative compared to the proposed project, energy impacts associated with the Reduced Project Footprint on Vacant Parcel Alternative would be less than the proposed project.

### 9.2.3.6 Greenhouse Gases

The Reduced Project Footprint on Vacant Parcel Alternative would incorporate a similar project design as Phase 1/Phase 2, that includes on-site solar energy. The Cliffridge property would be used under this alternative, which would not have the same energy-efficient design measures as a new building. Overall, it can be reasonably assumed that this alternative would use similar amounts of energy, and thus have similar GHG emissions as Phase 1/Phase 2. Impacts associated with this alternative would be similar to Phase 1/Phase 2. Design features would be consistent with the City CAP. Therefore, like the proposed project, it would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.
9.0 Project Alternatives

Comparison of Impacts to Greenhouse Gases

Because the project would be required to be consistent with the City CAP, impacts associated with GHG under the Reduced Project Footprint on Vacant Parcel Alternative would be similar compared to the proposed project.

9.2.3.7 Historical Resources

Development of this alternative would result in the same general construction impacts as the Phase 1/Phase 2 project. No significant resources have been observed on the project site, and none are anticipated. In addition, there are no known religious or sacred uses on-site or within the immediate vicinity of the project site. Impacts to historical resources under this alternative would be less than significant.

Comparison of Impacts to Historical Resources

Therefore, as with Phase 1/Phase 2, no impacts Impacts to historical resources under this alternative would occur under this alternative. be similar compared to the proposed project.

9.2.3.8 Noise

Noise impacts associated with this alternative would be similar to those of Phase 1/Phase 2. While the development footprint would be reduced under this alternative, short-term construction noise would occur; however, like Phase 1/Phase 2, regulations on equipment and hours of operations would ensure that construction noise impacts to adjacent residential units would be less than significant.

The entire project site would be exposed to noise due to projected future traffic on area roads. Due to projected exterior noise levels, interior noise levels would exceed the 45 dB(A) CNEL threshold under both the Reduced Project Footprint on Vacant Parcel Alternative and Phase 1/Phase 2. Thus, mitigation would be required to reduce interior noise levels with this alternative and Phase 1/Phase 2 to below a level of significance.

Comparison of Noise Impacts

Overall, Impacts would be similar compared to the Phase 1/Phase 2 project.

9.2.3.9 Paleontological Resources

Impacts associated with paleontological resources resulting from the Reduced Project Footprint on Vacant Parcel Alternative would be similar to those of Phase 1/Phase 2. Like the proposed project, Grading operations associated with this alternative would exceed the threshold for the high paleontological sensitivity areas. This alternative would require mitigation during construction similar to Phase 1/Phase 2 to ensure the recovery of any resources.
Comparison of Impacts to Paleontological Resources

Overall, impacts associated with paleontological resources under this alternative would be similar compared to the proposed project.

9.2.3.10 Hydrology

Like the proposed project, construction activities under this alternative would be required to meet applicable regulations and standards related to the maintenance of hydrologic flow rate from the project site to off-site storm drain systems. Post development BMPs reducing increased runoff resulting from new impervious surfaces flows would be required. Conformance with storm water regulations would assure that impacts associated with hydrologic conditions would be less than significant.

Comparison of Impacts to Hydrology

Implementation of this alternative would not result in increased storm water volume or runoff. Impacts associated with hydrology would be similar compared to the proposed project.

As with Phase 1/Phase 2, the Reduced Project Footprint on Vacant Parcel Alternative would not substantially alter on- and off-site drainage patterns. Runoff volume and flow rates associated with this alternative would decrease slightly over those calculated for Phase 1/Phase 2. Under developed conditions, flows would be directed into a similar storm drain system as Phase 1/Phase 2. Impacts under both Phase 1/Phase 2 and the Reduced Project Footprint on Vacant Parcel Alternative are not considered significant. However, because the reduced project would result in an incremental decrease in runoff volume and flow rates, impacts would be considered less than Phase 1/Phase 2.

9.2.3.11 Water Quality

Like the proposed project, this alternative would be required to implement construction BMPs in accordance with the performance standards in the City’s Storm Water Standards Manual. These measures would assure that impacts to water quality would be less than significant.

Comparison of Impacts to Water Quality

Implementation of this alternative would not result in increased polluted runoff. Impacts associated with water quality would be similar compared to the proposed project. Impacts to water quality under the Reduced Project Alternative would slightly decrease compared to Phase 1/Phase 2 due to the reduced amounts of impervious surfaces. Similar to Phase 1/Phase 2, this alternative would incorporate a low impact design, as well as source and structural BMPs, which would likely lessen or altogether avoid water quality impacts.
While impacts would be less than significant under either Phase 1/Phase 2 or the Reduced Project Alternatives, because there would be a decrease in the amount of surface runoff under this alternative, impacts would be considered less than Phase 1/Phase 2.

9.2.3.12 Visual and Neighborhood Character

The design of the Reduced Project Footprint on Vacant Parcel Alternative Reduced Project Alternative provides a design similar to the proposed project, but reduced scale, more similar to the surrounding single-family residential uses. This alternative would consist of two one-story buildings of similar architecture style and building materials as the existing Cliffridge structure on-site residence being used by Hillel and the adjacent houses on Cliffridge Avenue. Impacts associated with visual and neighborhood character would be less than significant.

Comparison of Visual Impacts

Although the However, Phase 1/Phase 2 project would have nonot result in significant visual impacts, due to this alternative’s reduced scale, would have less visual impacts would be less than the proposed project, due to the increase in landscaped areas compared to that of the project.

9.2.3.13 Conclusion of Feasibility Related to the Reduced Project Footprint on Vacant Parcel Alternative

Implementation of the Reduced Project Footprint on Vacant Parcel Alternative would result in fewer significant impacts than the proposed project. Under this alternative impacts associated with land use, traffic, biological resources, geology/soils, GHG, historical resources, noise, paleontological resources, hydrology, at water quality would be similar to the proposed project. Although less than significant, the degree of impacts associated with energy and visual resources would be less than the proposed project.

While creating a permanent space for the Hillel facility, this alternative would not meet the major project objectives of providing adequate space for planned religious activities. It is therefore rejected as infeasible.

9.2.4 Site 675 Alternative

The intention of this alternative is to locate the proposed Hillel facilities on an alternate site—Site 675—the only vacant and available non-UCSD-owned site near the UCSD campus (the Phase 1/Phase 2 project cannot be located on land owned by UCSD due to church and state separation issues). The heavily sloping 13,400-square-foot property is located at the intersection of La Jolla Village Drive and Gilman Drive, surrounded by UCSD lands. Figure 9-24 shows the location of the Site 675 alternative.
Under this alternative, similar to Phase 1/Phase 2, the Cliffridge property would be returned to its original use pending development of a permanent facility for Hillel. The Site 675 Alternative would construct three buildings similar in design and scale as those of Phase 1/Phase 2. In addition, the courtyard/inner yard area would be similar to the project and landscaped with native and drought-tolerant trees, shrubs, and groundcover.

A comparative analysis of the impacts associated with this alternative and Phase 1/Phase 2 is provided below.

### 9.2.4.1 Land Use

The Site 675 Alternative would comprise the same land use changes as Phase 1/Phase 2, but would be located on a parcel owned by the City adjacent to La Jolla Village Drive and surrounded by UCSD. Site 675 is designated as Roads/Freeways/Transportation by the General Plan given its location near major roadways. The site is zoned for single-family residential, consistent with the northeastern portion of LJSPD Ordinance. Based on site design, this alternative may require deviations from development regulations similar to Phase 1/Phase 2, or in addition to the deviations discussed for Phase 1/Phase 2.

**Comparison of Land Use Impacts**

Since this alternative would be a similar footprint and concept as Phase 1/Phase 2, land use impacts would be similar and are not considered significant compared to the proposed project.

### 9.2.4.2 Transportation/Circulation/Parking

Traffic generation under this alternative would be the same as Phase 1/Phase 2. All street segments projected to operate at LOS E or worse in the near-term and Year 2030 condition would remain deficient with or without either the reduced project or Phase 1/Phase 2. However, neither the project nor this alternative’s contribution to deficient area roadways would be significant.

Due to transportation constraints along La Jolla Village Drive, it is anticipated that the Site 675 Alternative would require access to the site from Scholars Drive South, which is on the UCSD campus. From there, construction of a road of several hundred feet through a grove of mature eucalyptus trees would be required. If this alternative is chosen, under this alternative, it is possible that subterranean parking would be required. Prior to the approval of development plans, a project-specific transportation impact analysis would need to be performed.

**Comparison of Traffic Impacts**

Overall, because this alternative would not add additional trips on the local roads or result in degradation of LOS, impacts associated with traffic would might be considered the same as similar compared to the Phase 1/Phase 2 project.
### 9.2.4.3 Biological Resources

The removal of on-site vegetation and mature eucalyptus trees to accommodate access under this alternative would result in significant impacts. In addition, short-term disruption to raptors and breeding or nesting birds could occur under the Site 675 Alternative as a result of construction activities. Mitigation similar to the proposed project would be required to reduce these significant impacts to less than significant. A detailed biological resources survey would need to be completed prior to the approval of development plans to determine project impacts to biological resources.

#### Comparison of Impacts to Biological Resources

Although mitigation would reduce significant impacts, due to the greater degree of disturbance to raptor foraging habitat and undisturbed on-site vegetation, impacts to biological resources under the Site 675 Alternative would result in greater impacts to biological resources than the Phase 1/Phase 2 project due to the relatively undisturbed nature of the vegetation and steep slopes.

### 9.2.4.4 Geologic Conditions

Under this alternative, geologic conditions on the project site may pose constraints on development due to the heavily sloping topography of the site. In addition, as with the project, this alternative is located within a seismically active area. Under this alternative, a detailed geological investigation and soil study would need to be completed prior to the approval of development plans to ensure impacts to future development from geologic hazards are less than significant.

#### Comparison of Impacts to Geological Conditions

Overall, compliance with the most recent building codes would reduce any significant impacts from the Site 675 Alternative, and impacts would be similar compared to the Phase 1/Phase 2 project.

### 9.2.4.5 Energy Conservation

Because the Phase 1/Phase 2 project and the Site 675 Alternative would result in construction of similar facilities, demands for electricity and natural gas would be approximately the same. As with Phase 1/Phase 2, the design of this alternative incorporates energy-efficient design measures (related to electricity, natural gas, and water use) and would be built in accordance with CalGreen. Impacts would be less than significant.
Comparison of Impacts to Energy Conservation

Given the highly energy-efficient design that exceeds mandated energy efficiency standards, both the Site 675 Alternative and Phase 1/Phase 2 would not result in the use of excessive amounts of energy during its long-term operation. Impacts associated with Energy Conservation under this alternative would be the same as similar compared to the Phase 1/Phase 2 project.

9.2.4.6 Greenhouse Gases

Operational emissions of GHGs would be the same as Phase 1/Phase 2 under the Site 675 Alternative because it proposes the same land use. However, this alternative would be required to implement design measures consistent with the City CAP to assure its compliance with relevant plans, policies, and regulations focused on the reduction of GHG emissions. Through implementation of these measures, impacts associated with GHG would be less than significant. Due to the additional construction activities required for site access, there would be a short-term increase in construction-related GHG emissions associated with this alternative.

Comparison of Impacts to Greenhouse Gases

Therefore, due to compliance with the City CAP, any impacts resulting from emissions under this alternative's would contribution to global warming would be greater than those of similar compared to the Phase 1/Phase 2 project, but would not be considered significant.

9.2.4.7 Historical Resources

The La Jolla area has been a rich source of both prehistoric and historic cultural resources. As detailed in Section 4.7, the Phase 1/Phase 2 project would not disturb any historical resources, and as such, the development of the Site 675 Alternative may impact historical resources because research into that site's resources has not occurred. Impacts could be significant. However, prior to the approval of development plans, a site-specific cultural resources survey would be required to determine if significant prehistoric, historic, or cultural resources are present, and if so, mitigation would be required. As detailed in Section 4.7, the Phase 1/Phase 2 project would not disturb any historical resources. Thus, the alternative site would not be able to reduce any impacts associated with historical resources.

Comparison of Impacts to Historical Resources

Overall, however, future construction activities associated with the Site 675 Alternative would require a site-specific survey with implementation of mitigation, if needed, not be allowed to result in the loss of significant cultural resources due to City and State historical resources regulations. Thus, any impacts would be considered similar compared to that of the Phase 1/Phase 2 project.
9.2.4.8 Noise

Like the project, the design of this alternative would need to take into consideration noise constraints from traffic on La Jolla Village Drive. Under this alternative, future traffic noise levels on the southern portion of the site adjacent to La Jolla Village Drive may exceed 70 dB(A) CNEL. Due to projected exterior noise levels, interior noise levels could exceed 45 dB(A) CNEL threshold. In addition, potential impacts may occur unless useable exterior open space is planned in areas with noise levels less than 65 dB(A) CNEL. Prior to the approval of development plans, a site-specific noise study would need to be conducted to determine the location and extent of potentially significant impacts based on the site plan.

Comparison of Noise Impacts

Therefore, through implementation of mitigation measures aimed at the reduction of interior noise levels, impacts related to noise would be similar compared to that of the Phase 1/Phase 2.

9.2.4.9 Paleontological Resources

Impacts associated with paleontological resources resulting from the Site 675 Alternative would be the same as the project. Similar to the project site, Site 675 is in an area with moderate sensitivity for paleontological resources. Construction activities associated with this alternative would have the potential to result in significant impacts to paleontological resources as a result of grading activities and would require mitigation during construction.

Comparison of Impacts to Paleontological Resources

Impacts associated with paleontological resources resulting from the Site 675 Alternative would be the same as the same as similar compared to the proposed project.

9.2.4.10 Hydrology

Like the proposed project, construction activities under this alternative would be required to meet applicable regulations and standards related to the maintenance of hydrologic flow rate from the project site to off-site storm drain systems. Post development BMPs reducing increased runoff resulting from new impervious surfaces flows would be required. Conformance with storm water regulations would assure that impacts associated with hydrologic conditions would be less than significant.

Comparison of Impacts to Hydrology

Implementation of this alternative would not result in increased storm water volume or runoff. Impacts associated with hydrology would be similar compared to the proposed project.
Because the Site 675 Alternative is on a steep slope and proposes similar land uses as Phase 1/Phase 2, runoff volume and flow rates associated with this alternative may be higher or require additional analysis compared to the Phase 1/Phase 2 site. Prior to the approval of development plans, a site-specific hydrology and hydraulic study would need to be completed to determine the net impact to the existing downstream storm drain system. Overall, this alternative would require more grading and disturbance of pervious surfaces; thus, impacts would be greater than Phase 1/Phase 2.

9.2.4.11 Water Quality

Like the proposed project, this alternative would be required to implement construction BMPs in accordance with the performance standards in the City’s Storm Water Standards Manual. These measures would assure that impacts to water quality would be less than significant.

Comparison of Impacts to Water Quality

Implementation of this alternative would not result in increased polluted runoff. Impacts associated with water quality would be similar compared to the proposed project. Development of this alternative would result in the same impacts to water quality as Phase 1/Phase 2, although construction and post-construction systems would need to be designed for the sloped project site. Similar to Phase 1/Phase 2, BMPs would be required in order to avoid significant impacts to water quality. Impacts would be similar to Phase 1/Phase 2.

9.2.4.12 Visual and Neighborhood Character

Land uses to the west and north include the La Jolla Playhouse and UCSD campus. The Mandell-Weiss Theatre and Forum and Potiker Theatre are the closest UCSD structures and consist of a modern design with geometric lines, extensive glazing, and sloping metal overhanging or arching roofs, with materials consisting of natural wood and stone and light or earth-toned stucco and concrete. Given that this alternative would be designed to incorporate the same uses and a similar building design, building scale, and focus on landscaping elements as the Phase 1/Phase 2 project, including use of glass, natural stone and wood, and earth-toned stucco and concrete surfaces which conforms to LJSPD design requirements. The construction would likewise relate to materials and colors used in the existing utilitarian structures. Impacts would be less than significant.

Comparison of Visual Impacts

The Visual impacts under the Site 675 Alternative would result in similar visual impacts compared to Phase 1/Phase 2 project. As with Phase 1/Phase 2, this alternative’s use of glass, natural stone and wood, and earth-toned stucco and concrete surfaces conforms to LJSPD design requirements as well as to materials and colors used in the existing utilitarian structures.
9.2.4.13 Conclusion

Implementation of the Site 675 Alternative would result in mostly similar impacts as the proposed project except it would result in greater impacts to biological resources.

This alternative would meet most of the project objectives; however, it would not meet the major project objectives of providing a space owned by Hillel.

9.3 Environmentally Superior Alternative

CEQA Guidelines (Section 15126.6(e)(2)) require that an environmentally superior alternative be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative which would result in the least adverse environmental impacts to the project site and surrounding area. The Existing with Improvements option Alternative is an alternative to the project that is analyzed throughout the EIR, and is identified as the Environmentally Superior Alternative.

The Existing with Improvements option Alternative would incrementally reduce the Phase 1/Phase 2 project’s less-than-significant impacts related to biology, energy, global climate change, hydrology, water quality, and noise, paleontological resources, and visual effects/neighborhood character. The Existing with Improvements option would also reduce the Phase 1/Phase 2 project’s significant and mitigated impacts associated with biological resources and paleontological resources. The Existing with Improvements option, like the Phase 1/Phase 2 project, would also require mitigation to reduce noise impacts to a less-than-significant level.

The Existing with Improvements option Alternative would not meet many of the project’s objectives. This alternative would not provide a consolidated location with enough space for programs and activities and offices for religious leaders; would not enhance pedestrian access, orientation, and walkability of the area surrounding the project site; would not enhance the religious, spiritual, and community-building activities through the design and character of indoor and outdoor spaces; and would not implement the sustainable development goals through the installation of sustainable design features and building practices.

While Phase 1/Phase 2 would have incrementally greater impacts, these impacts would all be reduced to below a level of significant for the project. Both the Phase 1/Phase 2 and Existing with Improvements Alternative would require mitigation to reduce impacts to a less than significant level. A summary comparison of Phase 1/Phase 2 to the alternatives considered is shown in Table 9-34.
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<td>Land Use</td>
<td>No significant impacts</td>
<td>Less than Similar as Phase 1/Phase 2</td>
<td>Same Similar as Phase 1/Phase 2</td>
<td>Same Similar as Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Traffic/Circulation</td>
<td>No significant impacts</td>
<td>Less than Similar as Phase 1/Phase 2</td>
<td>Less than Similar as Phase 1/Phase 2</td>
<td>Same Similar as Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Biological Resources</td>
<td>Significant impacts mitigated to below level of significance</td>
<td>Less than Phase 1/Phase 2</td>
<td>Less than Phase 1/Phase 2</td>
<td>Same Similar as Phase 1/Phase 2</td>
<td>Similar Greater than as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Geology and Soils</td>
<td>No significant impacts</td>
<td>Less than Similar as Phase 1/Phase 2</td>
<td>Less than Similar as Phase 1/Phase 2</td>
<td>Same Similar as Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Energy</td>
<td>No significant impacts</td>
<td>Less than Phase 1/Phase 2</td>
<td>Less than Phase 1/Phase 2</td>
<td>Same Similar as Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Global Climate Change</td>
<td>No significant impacts</td>
<td>Less than Similar as Phase 1/Phase 2</td>
<td>Less than Similar as Phase 1/Phase 2</td>
<td>Same Similar as Phase 1/Phase 2</td>
<td>Similar Greater than as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Cultural/Historic Resources</td>
<td>No significant impacts</td>
<td>Same as Phase 1/Phase 2</td>
<td>Same Similar as Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Noise</td>
<td>Significant impacts mitigated to below level of significance</td>
<td>Same as Less than Phase 1/Phase 2</td>
<td>Same Similar as Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Paleontological Resources</td>
<td>Significant impacts mitigated to below level of significance</td>
<td>Less than Phase 1/Phase 2</td>
<td>Less than Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Hydrology</td>
<td>No significant impacts</td>
<td>Less than Similar as Phase 1/Phase 2</td>
<td>Less than Phase 1/Phase 2</td>
<td>Similar as Less than Phase 1/Phase 2</td>
<td>Similar Greater than as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Water Quality</td>
<td>No significant impacts</td>
<td>Less than Similar as Phase 1/Phase 2</td>
<td>Less than Phase 1/Phase 2</td>
<td>Similar Less than as Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
</tr>
<tr>
<td>Visual Effects and Neighborhood Character</td>
<td>No significant impacts</td>
<td>Less than Phase 1/Phase 2</td>
<td>Less than Phase 1/Phase 2</td>
<td>Less than Phase 1/Phase 2</td>
<td>Similar Same as Phase 1/Phase 2</td>
</tr>
</tbody>
</table>
FIGURE 9-1
Existing with Improvements Site Plan
FIGURE 9-2
Site 675 in Relation to the Project Boundary
10.0 Mitigation Monitoring and Reporting Program

California Environmental Quality Act, Section 21081.6, requires that a MMRP be adopted upon certification of an EIR to ensure that the mitigation measures are implemented. The MMRP specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The Phase 1/Phase 2 project, and an alternative to the project, referred to as Existing with Improvements, are described in the EIR. The EIR, incorporated herein as referenced, focused on issues determined to be potentially significant by the City of San Diego. The issues addressed in the EIR include land use, transportation/circulation/parking, biological resources, geologic conditions, energy, greenhouse gases, historical resources, noise, paleontological resources, hydrology, water quality, and visual effects and neighborhood character.

Public Resources Code section 21081.6 requires monitoring of only those impacts identified as significant or potentially significant. After analysis, potentially significant impacts requiring mitigation were identified for biological resources, noise, and paleontological resources. These significant effects are associated with the Phase 1/Phase 2. For the Existing with Improvements option, potentially significant impacts requiring mitigation were identified for noise. The environmental analysis concluded that all of the significant and potentially significant impacts could be avoided or reduced through implementation of recommended mitigation measures.

The MMRP for the project is under the jurisdiction of the City of San Diego as specified in Table 10-1. The following is an overview of the MMRP to be completed for the project.

Monitoring Activities

Monitoring activities would be accomplished by individuals identified in Table 10-1. While specific qualifications should be determined by the City of San Diego, the monitoring team should possess the following capabilities:

- interpersonal, decision-making, and management skills with demonstrated experience in working under trying field circumstances;
- knowledge of and appreciation for the general environmental attributes and special features found in the project area;
- knowledge of the types of environmental impacts associated with construction of cost-effective mitigation options; and
- excellent communication skills.
Program Procedures

Prior to any construction activities, a preconstruction meeting is required and will include all parties involved in the monitoring program to establish the responsibility and authority of the participants. Mitigation measures that need to be defined in greater detail will be addressed prior to any project plan approvals in follow-up meetings designed to discuss specific monitoring effects.

An effective reporting system must be established prior to any monitoring efforts. All parties involved must have a clear understanding of the mitigation measures as adopted, and these mitigations must be distributed to the participants of the monitoring effort. Those that would have a complete list of all the mitigation measures adopted by the City of San Diego would include the City of San Diego and its MMC. The MMC would distribute to each Environmental Specialist and Environmental Monitor a specific list of mitigation measures that pertain to his or her monitoring tasks and the appropriate time frame that these mitigations are anticipated to be implemented.

In addition to the list of mitigation measures specified in Table 10-1, the monitors will have Mitigation Monitoring and Reporting (MMR) forms, with each mitigation measure written out on the top of the form. Below the stated mitigation measure, the form will have a series of questions addressing the effectiveness of the mitigation measure. The monitors shall complete the MMR and file it with the MMC following the monitoring activity. The MMC will then include the conclusions of the MMR into an interim and final comprehensive construction report to be submitted to the City of San Diego. This report will describe the major accomplishments of the monitoring program, summarize problems encountered in achieving the goals of the program, evaluate solutions developed to overcome problems, and provide a list of recommendations for future monitoring programs. In addition, and if appropriate, each Environmental Monitor or Environmental Specialist will be required to fill out and submit a daily log report to the MMC. The daily log report will be used to record and account for the monitoring activities of the monitor. Weekly and/or monthly status reports, as determined appropriate, will be generated from the daily logs and compliance reports and will include supplemental material (i.e., memoranda, telephone logs, and letters).
General MMRP Requirements

The following are general MMRP requirements that would apply to the proposed project.

**A. GENERAL REQUIREMENTS – PART I Plan Check Phase (prior to permit issuance)**

1. Prior to the issuance of a Notice To Proceed for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department Director’s Environmental Designee shall review and approve all Construction Documents (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

2. In addition, the Environmental Designee shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, “ENVIRONMENTAL/MITIGATION REQUIREMENTS.”

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

   http://www.sandiego.gov/development-services/industry/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the “Environmental/Mitigation Requirements” notes are provided.

5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

**B. GENERAL REQUIREMENTS – PART II Post Plan Check (After permit issuance/Prior to start of construction)**

1. **PRE-CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The Permit Holder/Owner is responsible to arrange and perform this meeting by contacting the RE of the Field Engineering Division and City staff from MMC. Attendees must also include the Permit holder’s Representative(s), Job Site Superintendent and the following consultants: a qualified archaeological monitor and a Native American monitor, a qualified biologist, and a qualified paleontologist.

   NOTE: Failure of all responsible Permit Holder’s representatives and consultants to attend shall require an additional meeting with all parties present.
CONTACT INFORMATION:

a) The Primary Point of Contact is the RE at the Field Engineering Division – 858-627-3200.

b) For Clarification of Environmental Requirements, the applicant is also required to call RE and MMC at 858-627-3360.

2. **MMRP COMPLIANCE:** This Project, Project Tracking System Number 233958 and/or Environmental Document Number 233958, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the Development Services Department’s Environmental Designee (MMC) and the RE. The requirements may not be reduced or changed, but may be annotated (i.e., to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.).

NOTE: Permit Holder’s representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC before the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution, or other documentation issued by the responsible agency.

4. **MONITORING EXHIBITS**

All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the limit of work, scope of that discipline’s work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

NOTE: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.
5. **OTHER SUBMITTALS AND INSPECTIONS:**

The Permit Holder/Owner’s representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

<table>
<thead>
<tr>
<th>Issue Area</th>
<th>Document Submittal</th>
<th>Associated Inspection/Approvals/Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>General</td>
<td>Consultant Qualification Letters</td>
<td>Prior to Preconstruction Meeting</td>
</tr>
<tr>
<td>General</td>
<td>Consultant Construction Monitoring</td>
<td>Prior to or at Preconstruction Meeting</td>
</tr>
<tr>
<td>Biology</td>
<td>Biologist Limit of Work Verification</td>
<td>Limit of Work Inspection</td>
</tr>
<tr>
<td>Biology</td>
<td>Biology Reports</td>
<td>Biology/Habitat Restoration Inspection</td>
</tr>
<tr>
<td>Paleontology</td>
<td>Paleontology Reports</td>
<td>Paleontology Site Observation</td>
</tr>
<tr>
<td>Noise</td>
<td>Acoustical Reports</td>
<td>Noise Mitigation Features Inspection</td>
</tr>
<tr>
<td>Bond Release</td>
<td>Request for Bond Release Letter</td>
<td>Final MMRP Inspections Prior to Bond Release Letter</td>
</tr>
</tbody>
</table>

**Summary of Project Impacts and Mitigation Measures**

Table 10-1 summarizes the potentially significant project impacts and lists the associated mitigation measures and the monitoring efforts necessary to ensure that the measures for the Phase 1/Phase 2 project or the Existing with Improvements option are properly implemented. All the mitigation measures identified in the EIR are stated herein.
### TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PHASE 1/PHASE 2 AND EXISTING WITH IMPROVEMENTS OPTION PROJECT

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Mitigation Measures</th>
<th>Time Frame of Mitigation</th>
<th>Monitoring Reporting Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PHASE 1/PHASE 2 PROJECT</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>NOISE</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Exterior noise levels are projected to exceed 60 CNEL; hence, interior noise levels could exceed 45 CNEL. Interior noise impacts are potentially significant.</td>
<td><strong>NOS-1:</strong> At the time that building plans are available for the proposed buildings and prior to the issuance of building permits, a detailed acoustical analysis shall demonstrate that interior noise levels due to exterior sources will be at or below the 45 CNEL standard. Possible interior noise attenuation measures include using construction materials with greater noise reduction properties. The exterior to interior noise reduction provided by the building structure is partially a function of the sound transmission class values of the window, door, wall, and roof components used in the building. The greater the STC value, generally the greater the noise reduction. The necessary STC values required to reduce interior noise levels to 45 CNEL or less would be determined as a part of the required interior noise analysis. The applicant's final building plans shall identify all recommendations of the acoustical report, including STC ratings of windows and doors, ventilation requirements, insulation, plumbing isolation, etc. Final building plans shall be reviewed by the City of San Diego’s Acoustical Plan Checker to verify that the mitigation measures recommended in the acoustical report have been incorporated.</td>
<td>Prior to the issuance of building permits</td>
<td>City</td>
</tr>
<tr>
<td></td>
<td><strong>NOS-2:</strong> The design for the proposed buildings shall include a ventilation or air conditioning system to provide a habitable interior environment when windows are closed.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### TABLE 10-1

MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PHASE 1/PHASE 2 PROJECT AND EXISTING WITH IMPROVEMENTS OPTION

(continued)

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Mitigation Measures</th>
<th>Time Frame of Mitigation</th>
<th>Monitoring Reporting Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PHASE 1/PHASE 2 PROJECT</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>BIOLOGICAL RESOURCES</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cooper’s hawk is a CDFG species of special concern that could potentially occur on or adjacent to the project site. Because clearing and construction activities associated with Phase 1/Phase 2 could be disruptive to raptors including Cooper’s hawk and breeding or nesting birds, direct and indirect construction project impacts would be significant.</td>
<td><strong>BIO-1:</strong> To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction (precon) survey within 300 feet of proposed construction to determine the presence or absence of nesting birds on the proposed area of disturbance. The precon survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City’s Biology Guidelines and applicable state and federal Law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City’s MMC Section or RE, and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the precon survey, no further mitigation is required.</td>
<td>Prior to the issuance of a grading permit</td>
<td>City</td>
</tr>
</tbody>
</table>
TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PHASE 1/PHASE 2 PROJECT AND EXISTING WITH IMPROVEMENTS OPTION (continued)

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Mitigation Measures</th>
<th>Time Frame of Mitigation</th>
<th>Monitoring Reporting Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>PHASE 1/PHASE 2 PROJECT</td>
<td>PALEONTOLOGICAL RESOURCES</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Because of both the moderate and high sensitivity potential areas for paleontological resources, project grading could potentially destroy fossil remains, resulting in a significant impact to paleontological resources.</td>
<td>PALEO-1: The project shall follow the procedures outlined below as a condition of approval for Phase 1/Phase 2.</td>
<td>Prior to the issuance of any construction permit</td>
<td>City</td>
</tr>
<tr>
<td>I. Prior to Permit Issuance</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Entitlements Plan Check</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD ED shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>B. Letters of Qualification have been submitted to ADD</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. The applicant shall submit a letter of verification to Mitigation Monitoring Coordination identifying the Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>II. Prior to Start of Construction</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A. Verification of Records Search</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes,</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
but is not limited to, a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Precon Meetings

1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the CM and/or Grading Contractor.

   a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM, or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

   a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored, including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PHASE 1/PHASE 2 PROJECT AND EXISTING WITH IMPROVEMENTS OPTION
(continued)

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Mitigation Measures</th>
<th>Time Frame of Mitigation</th>
<th>Monitoring Reporting Agency</th>
</tr>
</thead>
</table>

3. When Monitoring Will Occur
   a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
   b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching
   1. The monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, Occupational Safety and Health Administration safety requirements may necessitate modification of the PME.
   2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition, such as trenching activities, does not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PHASE 1/PHASE 2 PROJECT AND EXISTING WITH IMPROVEMENTS OPTION
(continued)

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Mitigation Measures</th>
<th>Time Frame of Mitigation</th>
<th>Monitoring Reporting Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
<tr>
<td>3. The monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.</td>
<td></td>
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</tbody>
</table>

B. Discovery Notification Process

1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.

2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.

3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or e-mail with photos of the resource in context, if possible.

C. Determination of Significance

1. The PI shall evaluate the significance of the resource.
   a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
   b. If the resource is significant, the PI shall submit a Paleontological Recovery Program and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
   c. If the resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils), the PI shall notify the RE, or BI as
TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PHASE 1/PHASE 2 PROJECT AND EXISTING WITH IMPROVEMENTS OPTION
(continued)

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Mitigation Measures</th>
<th>Time Frame of Mitigation</th>
<th>Monitoring Reporting Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>appropriate, that a non-significant discovery has been made. The paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.</td>
<td></td>
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</tbody>
</table>


|                              | | |
|------------------------------| | |
|                              | The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required. | | |

<table>
<thead>
<tr>
<th>IV. Night and/or Weekend Work</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. If night and/or weekend work is included in the contract:</td>
</tr>
<tr>
<td>1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Preconstruction Meeting.</td>
</tr>
<tr>
<td>2. The following procedures shall be followed.</td>
</tr>
<tr>
<td>a. No Discoveries</td>
</tr>
<tr>
<td>In the event that no discoveries were encountered during night and/or weekend work, The PI shall record the information on the CSVR and submit to MMC via fax by 8 A.M. on the next business day.</td>
</tr>
<tr>
<td>b. Discoveries</td>
</tr>
<tr>
<td>All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.</td>
</tr>
<tr>
<td>c. Potentially Significant Discoveries</td>
</tr>
<tr>
<td>If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.</td>
</tr>
<tr>
<td>d. The PI shall immediately contact MMC, or by 8 A.M. on the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.</td>
</tr>
</tbody>
</table>
TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PHASE 1/PHASE 2 PROJECT AND EXISTING WITH IMPROVEMENTS OPTION
(continued)

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Mitigation Measures</th>
<th>Time Frame of Mitigation</th>
<th>Monitoring Reporting Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>B. If night work becomes necessary during the course of construction:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. The CM shall notify the RE, or BI as appropriate, a minimum of 24 hours before the work is to begin.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. The RE or BI, as appropriate, shall notify MMC immediately.</td>
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<td></td>
</tr>
<tr>
<td>C. All other procedures described above shall apply, as appropriate.</td>
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</tbody>
</table>

V. Post Construction

A. Preparation and Submittal of Draft Monitoring Report

1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.

   a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.

   b. Recording Sites with the San Diego Natural History Museum

      The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City’s Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.

2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
TABLE 10-1
MITIGATION MONITORING AND REPORTING PROGRAM FOR THE PHASE 1/PHASE 2 PROJECT AND EXISTING WITH IMPROVEMENTS OPTION
(continued)

<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Mitigation Measures</th>
<th>Time Frame of Mitigation</th>
<th>Monitoring Reporting Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>4. MMC shall provide written verification to the PI of the approved report.</td>
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<td></td>
</tr>
<tr>
<td>5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.</td>
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</tbody>
</table>

B. Handling of Fossil Remains

1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued.

2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.

C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification

1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.

2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.

D. Final Monitoring Report(s)

1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative) within 90 days after notification from MMC that the Draft Monitoring Report has been approved.

The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.
<table>
<thead>
<tr>
<th>Potential Significant Impact</th>
<th>Mitigation Measures</th>
<th>Time Frame of Mitigation</th>
<th>Monitoring Reporting Agency</th>
</tr>
</thead>
<tbody>
<tr>
<td>EXISTING WITH IMPROVEMENTS</td>
<td></td>
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<td></td>
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<tr>
<td>NOISE</td>
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<tr>
<td>Exterior noise levels are projected to exceed 60 CNEL; hence, interior noise levels could exceed 45 CNEL. Interior noise impacts are potentially significant.</td>
<td><strong>NOS-3</strong> Prior to the issuance of building permits, a detailed acoustical analysis shall demonstrate that interior noise levels within the Cliffridge property due to exterior sources would be at or below the 45 CNEL standard.</td>
<td>Prior to the issuance of building permits</td>
<td>City</td>
</tr>
</tbody>
</table>

Possible interior noise attenuation measures include using windows and doors with greater noise reduction properties, installing insulation, or isolating plumbing components. The exterior to interior noise reduction provided by the building structure is partially a function of the STC values of the windows and doors used in the building. The greater the STC value, generally the greater the noise reduction. The necessary STC values required to reduce interior noise levels to 45 CNEL or less, which may range from STC 25 to STC 35 for window and door components, would be determined as a part of the required interior noise analysis. The applicant’s final building plans shall identify all recommendations of the acoustical report, including STC ratings of windows and doors, ventilation requirements, insulation, plumbing isolation, etc. Final building plans shall be reviewed by the City’s Acoustical Plan Checker to verify that the mitigation measures recommended in the acoustical report have been incorporated.

**NOS-4** The design for the buildings shall include a ventilation or air conditioning system to provide a habitable interior environment when windows are closed.
11.0 References Cited

The following documents were used, referenced, or relied on in preparing this EIR, and the documents are available for public review and inspection at the City of San Diego. Some documents are additionally available for review on the City of San Diego website page at www.sandiego.gov. Second- or third-hand references found in other references and not actually used in preparation of this EIR are not included.

Association of Environmental Professionals

Atlas Civil Design

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   2010 Natural Diversity Data Base. Nongame-Heritage Program, California Department of Fish and Game, Sacramento.

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Linscott, Law & Greenspan, Engineers

Paul Design Group
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Silverman, Dennis

Southern California Soil & Testing, Inc. (SCST)
2011 Revised Geologic Reconnaissance Hillel Project Intersection of La Jolla Village Drive and La Jolla Scenic Way La Jolla, California.
State of California Water Resources Control Board (SWRCB)

Torcellini, P., Long, N., and Judkoff, R.

United States Department of Energy (U.S. DOE)

United States Energy Information Administration (U.S. EIA)

United States Environmental Protection Agency (U.S. EPA)

12.0 Individuals/ and Agencies Consulted and Certification

12.1 Individuals and Agencies Consulted

Agencies and individuals contacted during preparation of the EIR include the following:

City of San Diego
Development Services Department
- John S. Fisher, Project Manager
- Elizabeth Shearer-Nguyen, Associate Planner

12.2 Certification

This document has been completed by the City of San Diego’s Environmental Analysis Section under the direction of the Development Services Department Environmental Review Manager and is based on independent analysis and determinations made pursuant to the San Diego Land Development Code Section 128.0103.

A list of contributing City of San Diego and consultant staff members, their titles and affiliations, is provided below.

City of San Diego
Development Services Department
- John Fisher, Project Manager
- Elizabeth Shearer-Nguyen, Associate Planner, Environmental Review
- Don Weston, Engineering Review
- Raynard Abalos, Planning Review
- Billy Church, Landscaping Review
- Ismail Elhamad, Transportation Review
- Lesley Henegar, Long Range Planning
- Victoria Burgess, Facilities Financing
- Jim Quinn, Geology Review
- Larry Burgess, Structural Review
- Greg Hopkins, Map Check

Fire, Life and Safety Department
- Ron Carter, Fire Plans Officer

Water Department
- Mahmood Keshayarzi, Water Review
RECON Environmental, Inc.

Environmental Analysis and Report Preparation
- Bobbi Herdes, Principal/Project Manager
- Lisa Lind, Environmental Analyst/Assistant Project Manager
- Lori Spar, Assistant Project Manager
- Karen Bowling, Environmental Analyst
- Jessica Fleming, Acoustical Analyst
- Greg Kazmer, Environmental Analyst
- Susanna Morales, Environmental Analyst
- Beth Proscal, Biologist
- Steven Gaughran, Production Specialist
- Jennifer Gutierrez, Production Specialist
- Stacey Higgins, Production Specialist
- Sean Bohac, GIS Specialist
- Vince Martinez, Graphic Designer

Greenhouse Gas Technical Report
- Karen Bowling, Environmental Analyst
- David Gottfredson, Senior Acoustical and Air Quality Analyst

Biological Letter Report
- Beth Proscal, Biologist
- Gerry Scheid, Senior Project Biologist

Noise Technical Report
- Jessica Fleming, Acoustical Analyst
- David Gottfredson, Senior Acoustical and Air Quality Analyst

Southern California Soil and Testing, Inc.

Revised Geologic Reconnaissance Report
- Douglas Skinner, Senior Engineering Geologist

Linscott, Law and Greenspan, Engineers

Traffic Impact Analysis Report
- John Boarman, PE, Principal
- Cara Leone, Transportation Planner II

Brian F. Smith and Associates, Inc.

Cultural Resources Study
- Brian F. Smith, Principal Investigator
Paul Design Group

Preliminary Hydrology and Hydraulic Study
  • Bradley D. Sager, PE

Preliminary Water Quality Technical Report
  • Bradley D. Sager, PE