

ENVIRONMENTAL IMPACT REPORT

Project No. 212995 SCH No. 2010101030

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.

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.

<u>The Neither the Phase 1/Phase 2 project nor the Existing with Improvements Option</u> would <u>not</u> 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 pregrading 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 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.

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 and 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)

OTHER INTERESTED AGENCIES, ORGANIZATIONS AND INDIVIDUALS - CONTINUED

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-S)

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, Eilite

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

Serafeim 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

OTHER INTERESTED AGENCIES, ORGANIZATIONS AND INDIVIDUALS - CONTINUED Viejas Band of Kumeyaay 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

December 6, 2013

Date of Draft Report

March 24, 2017

Date of Final Report

Analyst: Shearer-Nguyen

Final EIR Information Sheet Hillel Center for Jewish Life Project No. 212995 / SCH No. 2010101030

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 update 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)

Age	encies and Organizations	
A B C D	State Clearinghouse and Planning Unit Department of Toxic Substances Control Native American Heritage Commission Rincon Band of Luiseno Indians San Diego Archaeological Society	RTC-6 RTC-8 RTC-14
Ind	ividuals	
F G H I	Berol, John A. (November 3, 2012) Berol, John A. (December 6, 2012) Oleata, Edward Starr, Ross M.	RTC-18 RTC-22
Δαι	SECOND PUBLIC REVIEW DRAFT (Recirculated January 2013) encies and Organizations	
J	-	DTC 22
K	Native American Heritage Commission La Jolla Community Planning Association	
Ind	ividuals	
L M N	Allen, Daniel TAlpinieri, Louis	RTC-79
0	Attiyeh, Richard	
Р	Bahadur, Neha	
Q	Berol, John	RTC-114
R	Boyden, Helen	
S	Broido, Jeffrey	
Т	Chrispeels, Maarten and Janet	RTC-122

Individuals (cont.)

U	Costello, Michael	. RTC-127
V	Dahlberg, Andrea	. RTC-137
W	Forbes, Gail	. RTC-139
Χ	Frankel, Ted and Johnnie	. RTC-148
Υ	Gallegos, Tila and Sorenseene, Nik	. RTC-149
Z	Granger, Patricia	. RTC-150
AA	Hamilton, Julie M	. RTC-181
AB	Jones, Oliver	. RTC-215
AC	Jones, Paula	. RTC-237
AD	Krawiec, Jamye	. RTC-246
ΑE	Kuster	. RTC-250
AF	Larsson-Kuster	. RTC-252
AG	Masouredis, Serafeim	. RTC-256
АН	McCann	. RTC-257
ΑI	Moore, Sue (3/6/13)	. RTC-264
AJ	Moore, Sue (3/11/13) (First)	. RTC-459
ΑK	Moore, Sue (3/11/13) (Second)	. RTC-460
AL	Mosson, Mary	. RTC-461
ΑM	Munk, Walter	. RTC-464
AN	Perrin, Charles	. RTC-467
AO	Rebeiz, K	. RTC-473
ΑP	Shufro, Judy	. RTC-523
AQ	Starr, Ross	. RTC-524
AR	Tanaka, Elaine	. RTC-532
AS	Tezcan, F. Akif	. RTC-533
ΑT	Varon, Alexander	. RTC-542
AU	Verbinski, Laurette	. RTC-622
ΑV	Wiggans, Roger	. RTC-623
	THIRD PUBLIC REVIEW DRAFT (Recirculated December 2013)	
	THIND I OBLIC ILL VIEW BITAL I (Necliculated December 2013)	
Age	ncies and Organizations	
ΑW	Native American Heritage Commission	. RTC-625
AX	State Clearinghouse	. RTC-630
ΑY	Rincon Band of Luiseno Indians	. RTC-632
ΑZ	Viejas Band of Kumeyaay Indians	. RTC-633
ВА	La Jolla Community Planning Association	. RTC-634
Indi	viduals	
BB	Allen, Daniel T	. RTC-666
BC	Attiyeh, Jessica F.	
-	• •	

Individuals (cont.)

BD	Attiyeh, Richard	RTC-678
BE	Berol, John A	RTC-686
BF	Chrispeels, Maarten and Janet	RTC-688
ВG	Douglas, Beverly	RTC-691
ВН	Granger, Patricia	RTC-693
Ы	Granger, Patricia	RTC-702
BJ	Hamilton, Julie	RTC-708
BK	Jones, Oliver W.	RTC-726
BL	Jones, Oliver W	RTC-733
ВМ	Kuster	RTC-757
BN	Larson-Kuster	RTC-760
ВО	Max	RTC-762
BP	Moore, Sue	RTC-764
BQ	Moore, Sue	RTC-770
BR	Mosson, Mary	RTC-772
BS	Oleata, Edward A	RTC-775
BT	Perrin, Charles	RTC-779
BU	Rebeiz, K	RTC-785
BV	Rebeiz, K	RTC-820
BW	Shufro, Judy	RTC-839
ВХ	Starr, Ross	RTC-840
BY	Tezcan, F. Akif	RTC-856
B7	Varon Alexander	RTC-862

Letter A



STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit



December 17, 2012

Elizabeth Shearet-Nguyen City of San Diego 1222 First Avenue, MS-501 San Diego, CA 92101

Subject: UCSD Hillel Center for Jewish Life (aka Hillel Student Center of San Diego) SCH#: 2010101030

Dear Etizabeth Sheare: -Nguyen:

A-1

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 December 14, 2012, 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 21104(c) of the California Public Resources Code states that:

"A responsible or office 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. Those comments shall be supported by succeife documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clamfication of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have compiled with the State Cleaninghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Cleaninghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Som my

Scott Morgan Director, State Clearinghouse

Enclosures ce: Resources Agency

> 400 TENTH STREET F.O. BOX 5044 SACRAMENTO, CALIFORNIA 95812-3044 TEL (916) 446-0618 PAX (916) 323-3018 www.opr.pa.gov

A-1 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 SCH# 2010101030 Project Title UCSD Hills! Contactor Jewish Life (aka Hille) Student Center of San Diego) Lead Agency San Diego, City of Type EIR Draft EIR Description The project applicant, Hillel, is organized as a 501(c)3 CA conprofit religious organization. Hillel currently uses the residential structure 8976 Cliffridge Avenue (Cliffridge property) for administrative offices, one-on-one counseling, and meetings with students. Permanent use of this facility would require improvements to increase on-site periting. In addition, Hillo) 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 parmitting and minor upgrades to existing facilities and development of a new permanent facility, the HCJL. The combined phases comprise the project and are referred to as Phase 1/Phase 2 in the EIR. **Lead Agency Contact** Name Eizabeth Shearer-Nguyen Agency City of San Diogo Phone (619) 446-5369 Fax email Address 1222 First Avenue, MS-501 State CA Zip 92101 City San Diego Project Location County San Diego City La Jola Region Lat/Long 32.869695° N / 117.242048" W Cross Streets Cliffridge Avenue Parcel No. 344-131-0100 Section Base Range Township Proximity to: Highways Airports Railways Waterways Schools Land Use Residential/Single Family Project Issues Biological Resources; Drainage/Absorption, Goologic/Salsmic; Noise; Traffic/Circulation; Vegetation; Water Quality; Wildlife: Landuse Reviewing Resources Agency; Department of Fish and Game, Region 5; Office of Historic Preservation; Agencies Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Cattrans, District 11. Regional Water Quality Contro. Board, Region 9; Department of Toxio. Substances Control Native American Heritage Commission Date Received 10/31/2012 Start of Review 10/31/2012 End of Review 12/14/2012



Letter B



Secretary to

Environmental Protection

Department of Toxic Substances Control



Deborah O. Raphael, Director 5796 Corporate Avenue Cypress, California 90630

Edmund G. Brown Jr. Governor

December 11, 2012

Ms. Elizabeth Shearer-Nguyen City of San Diego 1222 First Avenue, MS-501 San Diego, California 92101

NOTICE OF AVAILABILITY OF A DRAFTENVIRONMENTAL IMPACT REPORT FOR THE UCSD HILLEL CENTER FOR JEWISH LIFE PROJECT (SCH#2010101030), SAN DIEGO COUNTY, CALIFORNIA

Dear Mr. Shearer-Nguyen:

B-1 The Department of Toxic Substances Control (DTSC) has received your submitted Draft Environmental Impact Report (EIR) for the above-mentioned project. The following

project description is stated in your document:

"The applicant, Hillel" proposes to develop the Hillel Center for Jewish Life (HCJL) in two phases to provide additional space for religious programs in three buildings around a central courtyard, referred to as the Phase1/Phase 2 project. Site development permit and public right-of-way vacation to allow the applicant to develop the HCJL on a vacant site at the southwest corner of the intersection of La Jolla Village Drive and La Jolla Scenic Way, which is just south of the University of California at San Diego (UCSD). The project site contains the Cliffridge property that currently serves as Hillel office. The remainder of the site is currently vacant. 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 surrounded by various types of residential and institutional uses. The project site is within a Single Family Overlay Zone of the La Jolla Shores Planned District, Coastal Height Limit Overlay Zone, campus Parking Impact Zone and the La Jolla Community Planning Area."

Based on the review of the submitted document DTSC has the following comments:

B-2

 DTSC provided comments on the project Notice of Preparation (NOP) on November 5, 2010; those comments have not been addressed in the submitted Draft EIR. Please ensure that all those comments will be addressed in the Final Environmental Impact Report for the Project.

SE COMMON PROPERTY AND

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.

			NEOF ONCE
	Ms. Elizabeth Shearer-Nguyen December 11, 2012 Page 2		
B-3	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-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489. If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at rahmed@disc.ca.gov. or by phone at (714) 484-5491. Sincerely, Rafiq 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@opr.ca.gov. CEQA Tracking Center Department of Toxic Substances Control Office of Environmental Planning and Analysis P.O. Box 806 Sacramento, California 95812 Attn: Nancy Ritter mitter@dtsc.ca.gov CEQA # 3875	B-3	Comment noted. No further response is required.

Letter C

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION 915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 653-6251 Fax (916) 653-6251 Web Silts www.ninbc.ca.gov dec stance@ascholl.res



November 7, 2012

Ms. Elizabeth Shearer-Nguyen, Environmental Planner

City of San Diego Development Services Department

1222 First Avenue, MS 501 San Diego, CA 92101

Re: SCH#2010101030 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "UCSD Hillel Center for Jewish Life Project;" located in the City of San Diego in the La Jolla Planning Area; San Diego County, California

Dear Ms. Shearer-Nguyen:

C-1

The NAHC is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9. This project is also subject to California Government Code Section 65352.3.

C-2

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendment s effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC advises the Lead Agency to request a Sacred Lands File search of the NAHC if one has not been done for the 'area of potential effect' or APE previously.

C-3

The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. 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.

LETTER

RESPONSE

Culturally affiliated tribes and individuals may have knowledge of the religious and cultural 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.

C-4

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. 4321-43351). 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) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 et seg, and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 Secretary of the Interiors 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. 11593 (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.'

C-5

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he 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.

C-6

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 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.

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) 653-6251.

Sincerely,

Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Native American Contacts San Diego County November 7, 2012

Barona Group of the Capitan Grande Edwin Romero, Chairperson

1095 Barona Road Lakeside . CA 92040

Diegueno

PO Box 908 Alpine CA 91903

(619) 445-5337 Fax

irothauff@viejas-nsn.gov (619) 445-3810

(619) 443-6612 619-443-0681

La Posta Band of Mission Indians Gwendolyn Parada, Chairperson

PO Box 1120

sue@barona-nsn.gov

Boulevard , CA 91905

gparada@lapostacasino.

Diegueno/Kumeyaay

(619) 478-2113 619-478-2125

Kumeyaay Cultural Historic Committee Ron Christman

Viejas Band of Kumeyaay Indians Anthony R. Pico, Chairperson

56 Viejas Grade Road Alpine CA 92001

Diegueno/Kumeyaay

Diegueno/Kumeyaay

(619) 445-0385

San Pasqual Band of Mission Indians Allen E. Lawson, Chairperson

Dieguena

PO Box 365

Valley Center, CA 92082 allenl@sanpasqualband.com

(760) 749-3200 (760) 749-3876 Fax

Sycuan Band of the Kumeyaay Nation Daniel Tucker, Chairperson

5459 Sycuan Road Diegueno/Kumeyaay CA 92019 El Cajon

ssilva@sycuan-nsn.gov 619 445-2613 619 445-1927 Fax

Campo Band of Mission Indians Ralph Goff, Chairperson

36190 Church Road, Suite 1 Diegueno/Kumeyaay

Campo · CA 91906

chairgoff@aol.com (619) 478-9046 (619) 478-5818 Fax

Jamul Indian Village Raymond Hunter, Chairperson

P.O. Box 612 Diegueno/Kumeyaay

Jamul - CA 91935 jamulrez@sctdv.net (619) 669-4785 (619) 669-48178 - 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 Section 7050.5 of the Health and Safety Code, Section 5097.04 of the Public Resources Code and Section 5097.98 of the Public Resources Code

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010101030; CEOA Notice of Completion; draft Environmental Impact Report (DEIR) for the UCSD Hiller Center of Jewish Life Project; located at the University of California, San Diego; City of San Diego; San Diego County, California.

Native American Contacts San Diego County November 7, 2012

Mesa Grande Band of Mission Indians Mark Romero, Chalrperson

P.O Box 270

Diegueno Santa Ysabeli CA 92070

mesagrandeband@msn.com

(760) 782-3818 (760) 782-9092 Fax

Kwaaymii Laguna Band of Mission Indians Carmen Lucas

P.O. Box 775

Diegueno -Pine Valley . CA 91962

(619) 709-4207

Inaja Band of Mission Indians Rebecca Osuna, Chairman

2005 S. Escondido Blvd. Diegueno

Escondido . CA 92025

(760) 737-7628 (760) 747-8568 Fax

Kumeyaay Cultural Repatriation Committee Steve Banegas, Spokesperson

Diegueno/Kumeyaay

1095 Barona Road Lakeside CA 92040

sbenegas50@gmail.com (819) 742-5587 (619) 443-0681 FAX

San Pasqual Band of Indians

Kristie Orosco, Environmental Coordinator P.O. Box 365 Luiseno Valley Center, CA 92082 Diegueno

(760) 749-3200

council@sanpasqualtribe.org (760) 749-3876 Fax

Ewilaapaayp Tribal Office Will Micklin, Executive Director

4054 Willows Road Diegueno/Kumeyaay

Alpine CA 91901 wmicklin@leaningrock.net (619) 445-6315 - voice (619) 445-9126 - fax

Ewilaapaayp Tribal Office

Michael Garcia, Vice Chairperson

4054 Willows Road Diegueno/Kumeyaay

Alpine CA 91901 michaelg@leaningrock.net (619) 445-6315 - voice (619) 445-9126 - fax

Ipai Nation of Santa Ysabel Clint Linton, Director of Cultural Resources

P.O. Box 507 Diegueno/Kumeyaay

Santa Ysabel CA 92070 cjlinton73@aol.com (760) 803-5694 cilinton73@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 responsibility as defined in Section 70£0.5 of the Health and Sofety Code.

Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010101030; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the UCSD Hillel Center of Jewish Life Project; located at the University of California, San Diego; City of San Diego; San Diego County, California.

Native American Contacts San Diego County November 7, 2012

Manzanita Band of the Kumeyaay Nation Leroy J. Elliott, Chairperson P.O. Box 1302 Diegueno/Kumeyaay Boulevard CA 91905 Ijbirdsinger@aol.com (619) 766-4930 (619) 766-4957 - FAX

Kumeyaay Diegueno Land Conservancy Mr. Kim Bactad, Executive Director 2 Kwaaypaay Court Diegueno/Kumeyaay El Cajon - CA 91919 guassacl@onebox.com (619) 445-0238 - FAX (619) 659-1008 - Office klmbactad@gmall.com

Inter-Tribal Cultural Resource Protection Council Frank Brown, Coordinator 240 Brown Road Diegueno/Kumeyaay Alpine CA 91901 frankbrown6928@gmail.com (619) 884-6497

Kumeyaay Cultural Repatriation Committee Bernice Paipa, Vice Spokesperson 1095 Barona Road Diegueno/Kumeyaay Lakeside - CA 92040

Lakeside CA 92040 (619) 478-2113 (KCRC is a Colation 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 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.88 of the Public Resources Code.

This fist is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010101030; CEDA Notice of Completion; draft Environmental Impact Report (DEIR) for the UCSD Hillet Center of Jewish Life Project; located at the University of California, San Diego; City of San Diego; San Diego County, California. Letter D

RINCON BAND OF LUISEÑO INDIANS

Culture Committee

Post Office Box 68 · Valley Center, California 92082 · (760) 297-2622 or (760) 297-2635 & Fax: (760) 297-2639



November 7, 2012

The City of San Diego Development Services Department 1222 First Avenue, MS 501 San Diego, CA 92101

Subject: UCSD Hillel Center for Jewish Life, Project No. 212995 / SCH No. 2010101030

Dear E. Shearer-Nguyen,

This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the UCSD Hillel Center for Jewish Life, Project No. 212995 / SCH No. 2010101030. Rincon is submitting these comments concerning your Project's potential impact on Luiseño cultural resources.

- D-1 The Rincon Band has concerns for impacts to historic and cultural resources and findings of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. We recommend that you locate a Tribe within the project area to receive direction on how to handle any inadvertent findings according to their traditions and customs. Also, we recommend a Native American Monitor be present during any and all ground disturbances.
- D-2 If you would like information on Tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral. If for some reason you are unable to locate an interested tribe please notify us and we will be happy to assist you in the matter. We also request you update your contact information for Rincon and send any future letters and correspondence to the Rincon Tribal Chairman and the Tribal Historic Preservation Officer in the Cultural Resource Center, Post Office Box 68, Valley Center, CA 92082 (760) 297-2635.

Thank you for this opportunity to protect and preserve our cultural assets.

Sincerely

Rose Duro
Rincon Culture Committee Chairman

Bo Mazzetti Febal Chairman

Stephanie Spencer Vice Chairwoman Charlie Kolb Council Member Steve Stallings Council Member Laurie E. Gonzalez Council Member 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.

Letter E



San Diego County Archaeological Society, Inc.

Environmental Review Committee

29 November 2012

To: Ms. Elizabeth Shearer-Nguyen

Development Services Department

City of San Dicgo

1222 First Avenue, Mail Station 50.1 San Diego, California 92101

Subject: Draft Environmental Impact Report

UCSD Hillel Center for Jewish Life

Project No. 212995

Dear Ms. Shearer-Nguyen:

E-1

I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

We reviewed the DMNDs for two earlier versions of this project, in 2004 and 2008. As then, we agree that the project should have no significant impacts on cultural resources, and that no mitigation measures for such resources are necessary.

We appreciate being included in the City's environmental review process for this project.

Sincerely,

James W. Royle, Jr., Chairperson Environmental Review Committee

cc: Brian F. Smith & Associates SDCAS President

File

E-1 The comment concurs with the conclusion of the EIR that no significant impacts to cultural resources would occur. No further response is required.

P.O. Box 81106 San Diego, CA 92135-1106 (558) 538-0935

Letter F

F-1

John A. Berol 8521 Avenida de las Ondas La Jolla CA 92037

November 3, 2012

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

RE: UCSD HILLEL CENTER FOR JEWISH LIFE - Project No. 212995 / SCH No. 2010101030

Ladies and Gentlemen:

F-1 At page S-2 the draft Environmental Impact Report SAP No. 24000958 (EIR) correctly cites that "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])."

While the EIR makes frequent use of the word "religious" it also describes many additional purposes for the UCSD student center. The Municipal Code uses a catch all phrase to include all religions. That does not go so far as to include all buildings in which any religious activity takes place. A UCSD student center remains an institutional use even while it has religious purpose; and as an institutional use, its noise would harm residential life and thereby be unfair to home owners who bought in reliance upon a quiet Single Family Zone.

F-2 Also, at page 6-3 the EIR assumes that allowing this project's institutional use into the Single Family Zone would not make way for more such intrusion by other "UCSD student religious organizations" because "this area is largely constrained by existing development." In fact, this very applicant has converted an existing Single Family Home into an administrative office thereby setting an example for all other UCSD student religious organizations to follow. That is not within the reasonable expectation of what constitutes a neighborhood of Single Family Homes with churches, temples, and other places of worship.

Sincerely.

John A. Berol

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."

RESPONSE

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 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.

F-2

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.

G-1

Letter G

John A. Berol 8521 Avenida de las Ondas La Jolla CA 92037

December 6, 2012

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

RE: UCSD HILLEL CENTER FOR JEWISH LIFE, Project No. 212995 / SCH No. 2010101030 Draft Environmental Impact Report SAP No. 24000958 (DEIR)

Ladies and Gentlemen:

This supplements my letter of November 3rd.

- G-1 The DEIR authors have repeatedly inserted the word "religious" throughout the DEIR but they fail to show the meaningful relevance of that word in the context of the complete Municipal Code. Their wide open interpretation, if accepted, would become precedent for any building for which applicant states an expectation that the people inside will be engaged in religious activity. If accepted, this form of land use review would pave the way for such other institutional facilities such as for example a religious retreat center for corporate employees.
- G-2 The issue is not interpretation of religious activity but interpretation of the Municipal Code. The Code says that churches and temples are permitted. (1510.0303(e)). Then, instead of an impossible effort to list all names used to label every present and future house of worship for all present and future religions, the Code follows the archetype of churches and temples with the phrase "or buildings of a permanent nature, used primarily for religious purposes" (DEIR S-2). This can only be sensibly understood in the context of the company it keeps which is the preceding phrase "churches, temples." Houses of worship are permitted; churches and temples are an example of such.

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 offcampus 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

ity as the uses proposed in the Phase1/Phase 2. As stated in Chapter 3 of the EIR, "Hillel currently
property to provide religious programs—including one counseling, and administrative offices—for attending UCSD." As discussed above, this is an the zone and does not set a precedent or has evelopment of surrounding properties for similar vidual permitting and environmental review. It is the proposed Phase 1/Phase 2 project, the existing the property would terminate and the site would regle dwelling unit use.
ponse to comment G-1.
1

G-3

Continuation of letter of December 5, 2012
RE: UCSD HILLEL CENTER FOR JEWISH LIFE, Project No. 212995 / SCH No. 2010101030
Draft Environmental Impact Report SAP No. 24000958 (DEIR)

- 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 HCJL 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 <u>does</u> permit. Houses of worship in a residential Single Family Zone offer religious services to <u>all</u> residents without regard to their university affiliation. In contrast, an institutional UCSD student center would serve <u>only</u> UCSD students to the exclusion of everyone else. That would not be a good fit for a residential zone.

M. Berol

John A. Berol

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.

G-3 (cont.)

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.

G-4 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.

H-1

H-2

Letter H

UCSD Hillel Center Project # 212995

2 messages

Edward Oleata < edoleata@gmail.com > To: SDSEA@sandiego.gov

Fri, Dec 7, 2012 at 11:04 AM

E. Shearer-Nguyen 1202 First Avenue, MS505 San Diego, CA 92101

Dear Ms. Shearer-Nguyen,

I've lived a block away from the proposed site for the Hillel Center the past 44 years. I've seen UCSD grow from 5,000 to 25,000 students with projections to 30,000 in two more years. I'm opposed to the Hillel Center for a number of reasons.

- H-1

 First, it is proposed for a residential district. There is no street parking around here as it is. The center will remove more street parking. It will reduce the value of all of the residences directly across from it and within a hundred yards in any direction. You can expect law suits from some of those people. I've heard the developers presentation saying that it will not impact the parking or auto traffic in the area. Don't believe it. You can't build that center there without attracting cars, traffic and reducing parking. There must be a hundred families who live in the area who use the street that borders the property on the south go get in and out of the area every day. The area will be more unsafe.
- H-2 Second, There are a number of student centers and meeting places available to students on campus. There is also a large Synagogue a block further south than the proposed location. I'm sure that an area could be found on campus or at the Synagogue that are already built that will meet the need of the Jewish students at UCSD.
- H-3 La Jolla doesn't have enough park space for a community of it's size. Use the land for a children's park with grass, trees and playing apparatus for the children of the neighborhood.

Sincerely Yours,

Edward A. Oleata 2870 Glenbrook Way La Jolla, CA 92037 858-453-4570 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.

I-1

Letter I

Ross M. Starr, Ph.D. 8675 Cliffiridge Ave. La Jolla, CA 92037 November 25, 2012

Ms. E. Shearer-Nguyen Environmental Planner 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. 212995

Dear Ms. Shearer-Nguyen

I-2

Thank you for providing the 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:

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 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 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 or temple.

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 grudging (primarily symbolic) 15% of the building (library/chapel) may be for religious purposes.

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 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.

I-2 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.

1

I-3

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 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 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 occupant load of approximately 290 persons (see http://www.scribd.com/doc/13284922/Section-1004-Occupant-Load). That is the peak use figure that is relevant.

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 Municipal Code is quite clear in section 1510.0107 (a) and 142.0530(c) Table 142-05F. If one accepts the 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 Municipal Code; the proposal is at least 63 parking spaces deficient.

Perhaps the DEIR is premised on semantic misconstruction, 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.

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 Connection of San Diego (see http://wailua.ucsd.edu/studentorg/StudentOrgList.aspx?frmFocus=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 DEIR correctly notes that such follow-on development requires financial support and a choice of location; Phase 1 creates an ample precedent.

I-5

I-3 (cont.)

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.

I-4 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

2

I-4 (cont.)

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.

I-4 (cont.)

I-5

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.

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.

I-6a	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,	I-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.
l-6b	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 action 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 (Cliffridge 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 8900 block. Narrowing the roadway makes a street with dangerous	I-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.
I-6c	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. Pages 71 through 77 of (La Jolla) UCSD Hillel Center for Jewish Life / Project No. 212995 / Draft EIR / App-A-NOP Comment Letters document decades of City land use planning indeed including planning documents signed by Mr. Mark Steele designating the area as		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,
I-6d	open space and not suitable for development. Finding (c) cannot validly be made. The right of way provides the hardscape 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.		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.
I-7	Omission 2, Traffic Safety: The DEIR does 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 (Cliffridge 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 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.		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.
I-8	Omission 3, Violation of the La Jolla Shores Planned District Ordinance: The DEIR does not recognize that the proposed development violates the LJSPDO. The Ordinance is clear; university facilities do not belong in the single family residential area.		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.
	- T	I-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

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.

- I-9 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.
- I-10 Omission 5, Traffic Impact Analysis' failure to consider cumulative effect of Ventner Institute: The JC Ventner 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 HCJL. The Institute structure includes forty-five thousand (45,000) square feet with corresponding vehicular traffic on the adjacent La Jolla Village Dr. The Traffic Impact Analysis takes no account of the cumulative effect of HCJL and the Ventner 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

- I-9 There is no such requirement and the commenter does not provide evidence of such requirement. The project site is owned by Hillel.
- I-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/ 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

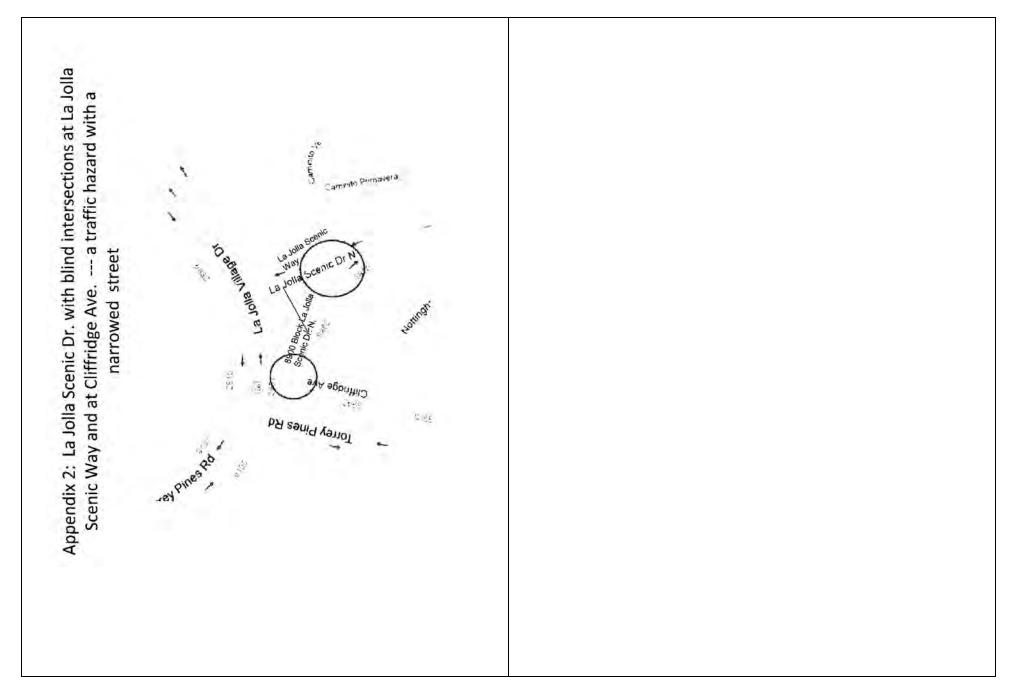
Hillel of San Diego Mission Statement

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.

5



Letter J

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 653-6251 Fax (916) 657-5390 Web Site www.nahic.ca.pov ds nahc@pacbell.net



January 25, 2013

Ms. Elizabeth Schearer-Nguyen, Environmental Planner

City of San Diego Development Services Department

1222 First Avenue, MS-501 San Diego, CA 92101

Re: SCH#2010101030 CEQA Notice of Completion; Re-Circulated draft Environmental Impact Report (RDEIR) for the "UCSD Hillel Center for Jewish Life Project (aka Hillel Student Center of San Diego):" located in the La Jolla Community Plan area of the City of San Diego: San Diego County, California

Dear Ms. Shearer-Nguyen:

J-1

The California Native American Heritage Commission (NAHC) is the State of California 'trustee agency' for the preservation and protection of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

J-2

J-3

The California Environmental Quality Act (CEQA - CA Public Resources Code 21000-21177, amendment's effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC advises the Lead Agency to request a Sacred Lands File search of the NAHC if one has not been done for the 'area of potential effect' or APE previously.

The NAHC "Sacred Sites," as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural

J-1 This comment is an introduction to comments that follow. No further response is required.

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

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.

J-4

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. 4321-43351). 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) & .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 Interiors 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. 11593 (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.'

J-5

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he 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.

J-6

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 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). J-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.

RESPONSE

J-5 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.

J-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.

о.

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 553-5251. Singerely, Dave Singleton Program Analyst Cc: State Clearinghouse Attachment: Native American Contact List	
4	

Native American Contacts San Diego County January 24, 2013

Barona Group of the Capitan Grande Edwin Romero, Chairperson

1095 Barona Road Diegueno

CA 92040 Lakeside sue@barona-nsn.gov (619) 443-6612 619-443-0681

Viejas Band of Kumeyaay Indians Anthony R. Pico, Chairperson

PO Box 908

Diegueno/Kumeyaay

· CA 91903 Alpine jrothauff@viejas-nsn.gov (619) 445-3810 (619) 445-5337 Fax

La Posta Band of Mission Indians Gwendolyn Parada, Chairperson

PO Box 1120

gparada@lapostacasino.

Diegueno/Kumeyaay Boulevard , CA 91905

(619) 478-2113 619-478-2125

Kumeyaay Cultural Historic Committee

Ron Christman

56 Viejas Grade Road Diegueno/Kumeyaay . CA 92001 Alpine

(619) 445-0385

San Pasqual Band of Mission Indians Allen E. Lawson, Chairperson

PO Box 365 Diegueno

Valley Center, CA 92082 alleni@sanpasqualband.com

(760) 749-3200 (760) 749-3876 Fax

Sycuan Band of the Kumeyaay Nation Daniel Tucker, Chairperson

5459 Sycuan Road Diegueno/Kumeyaay El Caion · CA 92019

ssilva@sycuan-nsn.gov 619 445-2613 619 445-1927 Fax

Campo Band of Mission Indians Ralph Goff, Chairperson

36190 Church Road, Suite 1 Diegueno/Kumeyaay

. CA 91906 Campo chairgoff@aol.com

(619) 478-9046 (619) 478-5818 Fax

Jamui Indian Village Raymond Hunter, Chairperson

P.O. Box 612 Diegueno/Kumeyaay

CA 91935 Jamul iamulrez@scldv.net (619) 669-4785 (619) 669-48178 - 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 Section 7050.5 of the Health and Safety Code. Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the propoed SCH#2010101030; CEQA Notice of Completion; Re-Circulated Draft Environmental Impact Report (RDEIR) for the UCSD Hillel Center for Jewish Life Project; located in the La Jolla Community Plan area of the City of San Diego; San Diego County, California.

Native American Contacts San Diego County January 24, 2013

Mesa Grande Band of Mission Indians Mark Romero, Chairperson P.O Box 270 Diegueno Santa Ysabel, CA 92070 mesagrandeband@msn.com

(760) 782-3818 (760) 782-9092 Fax

Kwaaymii Laguna Band of Mission Indians Carmen Lucas P.O. Box 775 Diegueno -

Pine Valley . CA 91962 (619) 709-4207

(619) 709-4207

Inaja Band of Mission Indians Rebecca Osuna, Chalrman 2005 S. Escondido Blvd. Diegueno Escondido CA 92025

(760) 737-7628 (760) 747-8568 Fax

(619) 443-0681 FAX

Kumeyaay Cultural Repatriation Committee Steve Banegas, Spokesperson 1095 Barona Road Diegueno/Kumeyaay Lakeside CA 92040 sbenegas50@gmail.com (619) 742-5587 Ewiiaapaayp Tribal Office Will Micklin, Executive Director 4054 Willows Road Diegueno/Kurneyaay Alpine . CA 91901

wmicklin@leaningrock.net (619) 445-6315 - voice (619) 445-9126 - fax

Ipay Nation of Santa Ysabel
Clint Linton, Director of Cultural Resources
P.O. Box 507
Diegueno/Kumeyaay
Santa Ysabeli CA 92070
cjlinton73@aol.com
(760) 803-5694
cjlinton73@aol.com

Manzanita Band of the Kumeyaay Nation Leroy J. Elilott, Chairperson P.O. Box 1302 Diegueno/Kumeyaay Boulevard CA 91905 ljbirdsinger@aol.com

(619) 766-4930 (619) 766-4957 - FAX

Kumeyaay Diegueno Land Conservancy Mr. Kim Bactad, Executive Director 2 Kwaaypaay Court Diegueno/Kumeyaay El Cajon CA 91919 guassacl@onebox.com (619) 445-0238 - FAX (619) 659-1008 - Office kimbactad@gmail.com

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This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010101030; CEQA Notice of Completion; Re-Circulated Draft Environmental Impact Report (RDEIR) for the UCSD Hillel Center for Jewish Litle Project; located in the La Jolla Community Plan area of the City of San Diego; San Diego County, California.

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 frankbrown6928@gmail.com (619) 884-6437

Kumeyaay Cultural Repatriation Committee Bernice Paipa, Vice Spokesperson 1095 Barona Road Diegueno/Kumeyaay Lakeside CA 92040 (619) 478-2113 (KCRC is a Colation 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 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the propoed SCH#2010101839; CECIA Notice of Completion; Re-Circulated Draft Environmental Impact Report (RDEIR) for the UCSD Hillel Center for Jewish Life Project; located in the La Jolla Community Plan area of the City of San Diego; San Diego County, California.

Letter K



La Jolla Community Planning Association

To: E. Shearer-Nguyen, Environmental Planner

City of San Diego, Development Services Department Center

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

Subject: LJCPA Comments on the Draft Environmental Impact Report for the UCSD

Hillel Center for Jewish Life

Project # 212995/ 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, oversized, italicized & underlined numbers were inserted for each comment in order to distinguish these numbers from the original text.

Sincerely,

Tony Crisafi, President

La Jolla Community Planning Association

PO Box 889, La Jolla, CA 92038 • 458.456.7900 • http://www.LaJollaCPA.org • info@LaJollaCPA.org

K-1

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 Com. 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-ofway.
- 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 DETR
- 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.

K-1 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.

La Jolla Community Planning Association Page 1 of 22

Motion

K-2

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 Com. Members: LJCPA 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:

K-2 <u>I.</u> I. 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.

K-3

K-4

- K-5 <u>2. Construction of nearby institutions</u>. 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.
- K-6

 3. Traffic. A single family house generates 10 ATD, Hillel currently yields 200 ADT (based on data of current use, not proposed larger facility). That is 20 times the amount of traffic from a house. The projected ADT seems unrealistically low, and does not

La Jolla Community Planning Association Page 2 of 22

Ad Hoc Committee Minutes

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

K-5 (cont.)

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.

K-6 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.

mother reason why the Municipal Code prohibits this use. K-7 DEIR didn't discuss the safety of reducing the street width of LJ Semis Drive North by 2 feet (to 34 th). Comes will be non-standard. Drivers will not expect this, how will safety be affected? The Verter Institute (45,000 sq ft, 1.40 parking spaces) and three other planned projects across Torrey Pines Rd and a most counted in the DEIR. Venter traffic will be required to turn right, go South on Torrey Pines Rd and La Jolla Village Drive. This impact is not discussed. Traffic in Summary. The DEIR is required to consider najor fature and comulative impacts. K-9 A. Precedent Setting for student centers in Single Family Zones. The mechanism could be a purches a single family bose than change use to a student center. I not its could make larger student centers. The DEIR, go 42, stars that UCSD has 45 spiritual organizations. As of his dust there are 60 spiritual organizations by the fide the three are 60 spiritual organizations. See This dust these are 60 spiritual organizations and the start factors in the residential zone changing the zones character. The Hillel facility would be the precedent setting for student centers 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 from the buildings interior. There is no mention of noise generated outside the buildings, curside ceremonies, people entering and existing buildings at right, opening-closing card doors, talking, tartific. The DEIR did not evaluate the maximum use of the facility complex, or at the maximum capacity, or the out of doors uses. There was an acknowledgment that noise will exceed that from the Cliffindge house. K-11 Noise Ordinance allows Single Family Residential: 50 dB(A) 10 PN to 7 AM to 10 PM 45 dB(A). 10 PN to 7 AM to 10 PM 45 dB(A). 10 PN to 7 AM to 10 PM 45 dB(A). 10 PN to 7 AM to 10 PM 45 dB(A). 10 PN to 7 AM to 10 PM 45 dB(A). 10 PN to 7 AM 5				
Places of worship are allowed exterior noise of: Higher educational institutions are allowed: To 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. As previously detailed in response to comment K-5, EIR 4.2.3.1(a) includes the Venter Institute project in the cur	K-9a K-9b K-9c K-9d K-10	DEIR didn't discuss the safety of reducing the street width of LJ Scenic Drive North by 2 feet (to 34 ft). Corners will be non-standard and the cornering radius will be non-standard. Drivers will not expect this, how will safety be affected? The Venter Institute (45,000 sq ft, 140 parking spaces) and three other planned projects across Torrey Pines Rd are not considered. Venter alone should add significant traffic, but not counted in the DEIR. Venter 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 Dunaway 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 in Summary. The DEIR is required to consider major future and cumulative impacts. 4. 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. Lot ties 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 60 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. 5. Noise. 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 car doors, talking, traffic. The DEIR did not evaluate the maximum use of the fac	K-7 The Ell Loope Cu La fee 36 The de woo what the can be	ne proposed reduction in width of La Jolla Scenic Drive detailed in R 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 resign Manual, Residential Local Streets are typically to provide a rb-to-curb width of at least 32 feet (with on-street parallel parking). In Jolla Scenic Drive North along the project frontage is currently 36 reterior curb to curb. Thus, the reduction of the roadway width from the feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be resigned to City standards. As such, the Phase 1/Phase 2 project
As previously detailed in response to comment K-5, EIR 4.2.3.1(a) includes the Venter Institute project in the cur	K-11	45 dB(A) 7 PM to 10 PM 40 dB(A) 10 PM to 7 AM Places of worship are allowed exterior noise of: Higher educational institutions are allowed: 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	Co Po res Ph	ondominiums (#9), the Salk Institute (#3), the Torrey Pines Glider ort (#14), and the Scripps Green Hospital (#12). Based on the sults of the traffic analysis, it was concluded that the hase 1/Phase 2 project would not contribute to a cumulative traffic
La Jolla Community Planning Association Page 3 of 22 Ad Hoc Committee Minutes analysis. The Venter Institute has revised the site plan			4.2	s previously detailed in response to comment K-5, EIR Section 2.3.1(a) includes the Venter Institute project in the cumulative alysis. The Venter Institute has revised the site plan to only

K-8	(cont.)	
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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.

K-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.

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."

K-9b

K-9b (cont.)

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.

- K-9c See response to comment K-9a.
- K-9d 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.

K-10 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 adiacent

K-10 (cont.)	
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 tha 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 brie 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.	
K-11 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 no 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.	

K-14

K-12 6. III. Visual Effects and Neighborhood Character DEIR Section 4.12 Applicable Design Regulations Section 4.12.1.3

Excerpts from Mr. Merten's Letter below.

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

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.

K-13 7. 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.

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.

(Ad Hoc Com. summary: The houses are generously set back 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 LJSPDO.

K-14 8. The LJSPDO states: General Design Regulations

To conserve important design character in La Jolla Shores, some <u>uniformity</u> 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 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. See Mr. Merten's Letter for complete content.

More Visual Effects and Neighborhood Character

K-15

9. 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

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- K-12 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.
- K-13 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.

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.

K-16	<u>10.</u> 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 sum.	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.
K-17	11. Traffic, ADT. Hillel currently yields 200 ADT, a single family house yields 10 ADT.		The Cite Development powert would be exhibited to conditions of
K-18	<u>12.</u> 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.		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
K-19	<u>13</u> . No Enforcement. There is no mechanism to maintain or enforce the level of activity or number of people at events.		detail proposed attendance levels. As detailed therein, it is expected, with limited exception, that programs to be held at the site will have
K-20	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.		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
K-21	IV. Project Objectives. 15. A. Goal of walking distance. UCSD is $\sim 2\frac{1}{2}$ miles E to W, and $\sim 1\frac{1}{2}$ 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.		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
K-22	16. B. There is to be a consolidation of uses from different areas to this site, yielding an		code.
K-23	increase in intensity of use at the single location. 17. C. There is no enforcement of Hillel's stated limits of use.	K-17	See response to comment K-6.
K-24	18. D. Purpose of the Facility.	K-18	See response to comment K-10 and K-16.
	House of Worship or Student Center? DEIR pg 3-15 Table 3-1, Student Center 3,682 sq ft Library/Chapel 984 sq ft 15%	K-19	See response to comment K-16.
	Leadership Building 1,813 sq ft 28% Gross Building Area 6,479 sq ft 100%	K-20	There is no such requirement and the commenter does not provide evidence of such requirement. The project site is owned by Hillel.
	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.	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
K-25	<u>19.</u> 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.		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-26	<u>20.</u> 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.	K-22	The project proposes to relocate the Hillel facility from its current location to an expanded facility. The uses would remain the same.
	La Jolla Community Planning Association Page 5 of 22 Ad Hoc Committee Minutes		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-23 See responses to comment K-16 and K-19. 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 courtvard 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-25 See response to comment K-24. 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

K-26 (cont.)

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.

	LDC requires Religious Inst. 1 parking space / 3 fixed seats	Plans in the DEIR show there are no fixed seats	Required NA	K-27	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
	or 30 spaces / 1,000 sq ft assembly area	reasonable assembly area (1,600 sq ft or 3,000 sq ft)	48-90 spaces		distance requirements; therefore, a total of six on-street parking spaces would be lost on La Jolla Scenic Way. The proposed street
K-27 K-28	Hillel is providing 27 parking spaces. That would be required by Code for a chu assuming 25% (1,600 sq ft) or 46% (3,00 was available for this purpose. 27 parkin 14% of the facility were designated for rethe proposed Hillel project appears to have institution for "allowed use" purposes are required parking purposes. 21. In addition to not meeting the parking removing 8 on street parking spaces, and another 20 or so spaces. VI. ROW Vacation. Vacation of the contraction of the contraction of the contraction of the contraction.	rch, temple, or place of religious of sq ft) of the total space availate spaces would be adequate only eligious assembly. As a result, we at least two distinct definition dia "student center" (or something standards, the proposed projethe cul-de-sac vacation with redul-de-sac at LJ Scenic Drive No	s assembly, ble in the facility ly if less than within the DEIR, ns—a religious ing else) for ct will be d curb will lose		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.
	22. Omission 1, Right of Way Vacation ROW Vacation can't be meet.)			K-28	See response to comment K-7.
	23. Omission 2, Traffic Safety, ROW dangerous blind corners) See Dr. Starr's		afe visibility.		The City would be required to review and approve the findings related to the proposed ROW vacation. The findings will be included
K-29	24. Parking impact. The Google photo street for parking. Up to 22 on street park vacated and the curb painted red for the s	king spaces will be lost if the ca	ıl-de-sac is		as part of the final resolution of approval and subject to the determination of the City Council.
K-30	25. Other Uses will be Impacted. The as a turn-around, parking. The City uses in	cal-de-sac is used 365 days a year it to park heavy equipment when	ear. People use it n needed.		With respect to Omission 2, the project driveway provides sight distance meeting City standards. The claim of "dangerous turns,"
K-31	26. VII. Cliffridge Property. The use in a Single Family Zone is illegal (Muni. and Phase I should not be permitted. Ph	Code131.0401). Continued us	se of an office		unsafe visibility, and dangerous blind curves are unfounded. See response to comment K-40.
	additional 6 parking spaces and reduction should also apply for a Residential High	Occupancy Permit. This would	be a significant	K-29	See response to comment K-27.
	impact on the surrounding community an		I.	K-30	As detailed in DEIR Section 4.2.5.1(a), vehicles may currently use
	Please read the attached written comment Mr. Phil Merten, Dr. Ross Starr Ms. Julie Hamilton,	ts received from:			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.).
	La Jolla Community Planning Association Pr	age 6 of 22 Ad Hoc	Committee Minutes		

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. La Jolla Community Planning Association Page 7 of 22 Ad Hoc Committee Minutes

K-30 (cont.)

K-31

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.

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).

		1	
	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 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.		
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-32	See responses to comments K-13 and K-14.
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	K-33	See responses to comments K-13 and K-14.
	LA Jolla Community Planning Association Page 8 of 22 Merten		

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 structure 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 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 LJSPDO.

K-34 Finally, the LJSPDO 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 <u>used in evaluating the appropriateness of any development</u> 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:

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

and

 $\underline{31.}$ • Create harmonious form relationships among houses. Groups of houses should appear related to one another rather than jumbled together without pattern.

<u>32</u>. • Strive for <u>consistency within groups through use of recurring shapes</u> 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.

K-34 See responses to comments K-13 and K-14.

LA Jolla Community Planning Association

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Merten

Ross M. Starr, Ph.D. 8675 Cliffridge Ave. La Jolla, CA 92037 January 30, 2013

Ms. E. Shearer-Nguyen Environmental Planner 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. 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:

K-35 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 simply 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 grudging (primarily symbolic) 15% of the building (library/chapel) may be for religious purposes.

K-35 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.

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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 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 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 occupant load of approximately 290 persons (see http://www.scribd.com/doc/13284922/Section-1004-Occupant-Load). That is the peak use figure that is relevant.	K-36	With respect to maximum allowable attendance, see response to comment K-16. With respect to accessory uses within the facility, see response to comment K-24.
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 142-05F. 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 "I [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 misconstruction, 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-37	See response to comment K-26.
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 Connection of San Diego (see http://tonga.uesd.edu/studentorgregistration/RdOnlyList.aspx?frmFocus=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	K-38	See response to comment K-9a.
	public attendance 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. fl. 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 structure includes ample space and accommodations for gatherings of hundreds of persons, Shabbat meals, guest speakers, holiday celebrations. The showers (for 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 offices would ordinarily imply an occupant load of approximately 290 persons (see http://www.scribd.com/doc/13284922/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 HCUL in the City's Municipal Code." On the contrary, of course, the LISPDO and the Municipal Code are quite clear in Municipal Code section 1510.0107 (a) and 142.0530(c) Table 142-05F. 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	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. fl. kitchen with 8-burner stove top; ground floor men's lavatory with two tollets, 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 be biyecle 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 1000 square feet of open assembly space, 984 square feet of library, and approximately 1000 square feet of offices would ordinarily imply an occupant load of approximately 290 persons (see http://www.scribd.com/doc/13284922/Section-1004-Occupani-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 HCIL in the City's Municipal Code." On the contrary, of course is a "church temple or building of a permanent nature, used primarily for religious purposes" that not building. of a permanent nature, used primarils for the require 195 parking space of probability and the structure of 6,479 square feet might then be construed to require 195 parking space pe

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 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 HCJL project (formerly known as Hillel of San Diego Student Center II) means that any UCSD student religiouslyaffiliated organization with enough money to buy several adjacent (already developed) lots will be freed by the HCJL 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

- 37. 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 action 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 (Cliffridge 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 payement 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.

Pages 71 through 77 of (La Jolla) UCSD Hillel Center for Jewish Life / Project No. 212995 / Draft EIR / App-A-NOP Comment Letters document decades of City land use planning

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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.

K 40	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 hardscape 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.		
K-40	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 (Cliffridge 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 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.	K-40	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
K-41	<u>39</u> . Omission 3, Violation of the La Jolla Shores Planned District Ordinance: The recirculated DEIR does not recognize that the proposed development violates the LJSPDO. The Ordinance is clear; university facilities do not belong in the single family residential area.		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
K-42	<u>40</u> . 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.		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.
K-43	<u>41.</u> 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	K-41	See response to comment K-35.
	Rd. from the proposed HCJL. 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 HCJL and	K-42	See response to comment K-20.
	the Venter Institute.	K-43	See response to comment K-5.
	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 Starr		

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.

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Starr

The EIR provides an accurate project description (see Chapter 3) in K-44 LA JOLLA COMMUNITY PLANNING ASSOCIATION TO: accordance with the requirements of Section 15124 of the CEQA AD HOC COMMITTEE - HILLEL DEIR Guidelines. Specifically, the existing vacant lot upon which the FROM: JULIE HAMILTON project is proposed is a total of 0.80 acre. The project also includes a SUBJECT: RESPONSE TO DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE ROW vacation which would add an additional 0.49 acre to the UCSD HILLEL CENTER FOR JEWISH LIFE 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) FEBRUARY 27, 2013 DATE: and 3-3 (final boundaries of the project site). Public Notice of Availability With respect to the comment relating to the description of the project as a student center, see response to comment K-9b. K-44 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 K-45 All EIR noticing requirements under CEQA were followed by the City right-of-way that is part of the project. The project description in the public notice and throughout as Lead Agency. The Notices of Availability of the Draft EIR were the DEIR describes the two sites as .2 acres and .8 acres - is the size of the site with or without the ROW vacation? The site should be described without the vacation since the vacation is part of the widely distributed to agencies, organizations, and individuals who proposed project. were known to have an interest in the project. In addition, the notice was published in the San Diego Daily Transcript. The notices K-45 43. Availability of the Draft EIR and all supporting documents is confusing the notice included a website indicating where the Draft EIR could be found. states the documents are available at the Development Services Center, but requires the reader to return to page one 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 K-46 See response to comment K-44. Branch Library (this is explained in the 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). K-47 The project objectives detailed within the EIR include the underlying Summary purpose of the project and are provided pursuant to CEQA in order to help the lead agency develop a reasonable range of alternatives K-46 44. S.1 - The Project Synopsis again fails to provide an accurate and stable project to evaluate (Section 15124(b) of the CEQA Guidelines). See description. The synopsis fails to describe the project as a student center and fails to include the response to comment K-21 (second paragraph). As detailed in vacation of public right-of-way in the project description. Section 3.1 of the Draft EIR, one of the project objectives is to K-47 45. S.1.2 - Project Objectives artificially manipulate outcomes by setting a goal of locating "contribute to regional goals to reduce vehicle use and promote the facility within walking distance of the southern portion of the UCSD campus - why the southern walkability by providing a facility within a convenient and walkable portion? Do more lewish students attend classes and live along the southern edge of UCSD? (1/4 mile) distance to activities in the southern portion of the UCSD Including this limitation within the project objectives prejudices the feasibility of an alternative site. campus and transit connections." The Phase 1/Phase 2 project K-48 46. S.5 - The project alternatives do not provide a reasonable range of "feasible" meets this objective because while religious in nature, the facility will alternatives that would reduce or avoid significant impacts. As an initial point, the DEIR finds the serve students who would be able to walk to and from campus within only significant impacts are noise (impact of noise from La Jolla Village Dr. on the facility), a reasonable distance. biological resources (nesting raptors), and paleontologial 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; K-48 Pursuant to CEQA Guidelines Section 15126.6, an EIR is required to there is little need to provide alternatives and/or mitigation measures that reduce these impacts. 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 La Jolla Community Planning Association Page 15 of 22 Hamilton 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/

K-49 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 8976 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.

K-50

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 this site. There is no imap 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

K-51 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.

K-52 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 8976 Cliffridge and .8 acres for Site 673 - is that the size of the site before or after the vacation?

K-53 51. 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.

K-54 52. 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.S-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.

K-55 <u>53</u>. 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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K-48 (cont.)

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 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.

K-49 The reduced project alternative was updated in the recirculated EIR (December 2013). The "Reduced Project Footprint on Vacant Parcel Alternative" was included in the reasonable range of alternatives to provide an alternative with a reduced development footprint compared to the proposed Phase1/Phase 2 project. As detailed in Section 9.2.3 of the EIR, this alternative includes a 33 percent reduction in development compared to the Phase1/Phase 2 proposal. By reducing the development footprint and the overall square feet of the facility, this alternative would accommodate fewer people, which would reduce the parking demand, thereby requiring less surface parking than the Phase 1/Phase 2. As disclosed in Sections 9.2.3.1 and 9.2.3.2 of the EIR, land use and traffic related impacts under the Reduced Project Footprint on Vacant Parcel Alternative would be similar when compared to Phase 1/Phase 2.

As with any development project, future expansion would be allowed only through applicable permit application processes.

See response to comment K-2. With respect to the specific location of Site 675, see Section 9.2.4 of the EIR which adequately details the Site 675 Alternative, including the location which is shown on Figure 9-1 (added as part of the recirculated EIR in December 2013).

K-50

K-51	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.
K-52	See response to comment K-51.
	With respect to the allowable use of the project site, see response to comment K-9b.
	With respect to the specific acreage of the site (with and without the ROW vacation), see response to comment K-44.
K-53	See response to comment K-44.
K-54	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. 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.
K-55	See response to comment K-16.

	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.
K-56	54. 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 Cliffridge 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.		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.
	Environmental Setting	K-57	As required under CEQA Guidelines Section 15125(a):
K-57	55. 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 Hillel's efforts to purchase the land for the sole purpose of construction of the student center, in 2000. At that time Site 673 was designated for open space, the Cliffridge property was not used for administrative offices, and there were significantly more trees on the property providing a more suitable environmental for raptors.		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.
	Environmental Impact Analysis		The NOP was published on October 8, 2010. Therefore, the baseline conditions are adequately described, and
	LAND USE		conditions prior to that date (i.e., in the year 2000) are not applicable according to CEQA. The history of the
K-58	56. 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		project is summarized in Section 3.6 of the EIR.
	space.	K-58	With respect to the use of the project site as "open space," in
K-59	57. 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.		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
K-60a	58. 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		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-60b	use. Should the Cliffridge Property be abandoned by Hillel 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	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
	La Jolla Community Planning Association Page 17 of 22 Hamilton		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.

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	in the City of San Diego. The proposed deviation will result in a significant land use impact due	K-61	Please see the responses to comments K-26 and K-37.
	to its inconsistency with the land development code.	K-62	See responses to comments K-9a and K-9b.
K-61	59. The DEIR fails to recognize the inherent conflict in determining the proposed student center is 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.	K-63	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
K-62	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.		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.
K-63	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 10:00 pm. No other development in the immediate vicinity presents a 100 foot 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.		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.
K-64	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 thresholds of significance, this inconsistency with the La Jolla Shores Design Manual and La Jolla Shores Planned District Ordinance is a significant land use impact.	K-64	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
K-65	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		consistent with all relevant land use regulations. See response to comment K-14.
	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	K-65	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
K-66	64. The study area fails to encompass all effected 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.		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.
	La Jolla Community Planning Association Page 18 of 22 Hamilton	K-66	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

K-66 (cont.)
project would add less than this amount to Glenbrook Way, an analysis of this roadway is not warranted. 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.

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K-67	parking lot. <u>65.</u> 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.	K-67	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.
K-68	66. 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.		Additionally, the project entails a facility used primarily for religious purposes, and is not a "student center" as identified within the comment.
K-69	67. 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.	K-68	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
K-70	68. 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.		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
K-71	<u>69.</u> 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		that runs weekdays from 7:00 a.m. to midnight and weekends from 9:00 a.m. to 8:00 p.m.
	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.	K-69	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
K-72	70. 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.		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
K-73	71. 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		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.
	center. The figures in the DEIR show 120 seats requiring a minimum of 40 parking spaces. 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 spaces per every 1,000 square feet. Assuming less than ½ of each building will be used for assembly area during significant events – the project provides at least 1,600 square feet of		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 Appendix B. to the EIR) and detailed in Appendix B. to the EIR)
	La Jolla Community Planning Association Page 19 of 22 Hamilton		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

K-69 (cont.)

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.

K-70	The methodology for determining the trip generation is consistent with City standards. See response to comment K-6.
K-71	See response to comment K-6.
K-72	See responses to comment K-5.
K-73	See responses to comments K-26, K-27, and K-37.
	The EIR identifies that the project site is located within the Parking Impact Overlay Zone within Section 4.1.1.1(c) of the EIR.

K-74

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.

- K-74

 The project description fails to accurately describe the proposed vacation of right-of-way and fails 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 Cliffridge Avenue. Local residents have provided substantial evidence of the hazard of narrower streets in
- K-75 this congested area. <u>74</u>. 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

- K-76 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 fails 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.
- K-77

 <u>76.</u> The DEIR fails to consider the design policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan.
- K-78 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.
- K-79

 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 sheer 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 well setback 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 bulk of the adjacent buildings and does

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See response to comment K-44. The recirculated EIR (December 2013) included this information. Please also refer to Section 3.4.2.1(i) of the EIR: "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 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.

K-75 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.

K-75 (cont.)

1 7 (com	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.
K-76	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.
K-77	See responses to comments K-13 and K-14.
K-78	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.
	of the EIR shows the landscaping elements of the Phase 1/Phase 2

K-79 See response to comments K-13, K-14, and K-15.
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.

K-80	not promote harmony in the visual relationships and transitions between new and older buildings. Therefore, the student center will have a significant visual impact. 79. 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	K-80	See responses to comments K-13, K-14, K-15, and K-79. It is not clear as to which specific institutions the commenter is referring to; however, project impacts associated with visual quality would be less than significant as discussed in Section 4.12 of the EIR.
K-81 K-82	80. 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	K-81	With respect to the allowable use of the project site, see response to comments K-9b. With respect to the component parts of the project as part of the primary use, see response to comment K-24. With respect to whether the project would be precedent setting, see response to comment K-9a.
11 02	81. 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	K-82	See response to comment K-5.
K-83	82. 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 the Hillel students only live and attend classes along in the	K-83	See response to comment K-2.
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14.04	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.	1/ 0/4	See recognize to comment I/ 2
K-84	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.	K-84	See response to comment K-2.
K-85	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.	K-85	See response to comment K-49.
K-86	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.	K-86	See response to comment K-48.
	Mitigation Monitoring and Reporting Program		
K-87	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	K-87	Based on the analysis in the EIR, the project would not have significant impacts to land use, transportation/circulation/parking,
	neighborhood character.		and visual effects and neighborhood character. Therefore, no mitigation measures are required.
	La Jolla Community Planning Association Page 22 of 22 Hamilton		

Letter L

1714 Kearsarge Road La Jolla CA 92037 3828

28 February 2013

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

> Subject: Hillel Center for Jewish Life, Re-circulated Draft EIR, Project No. 212995 / SCH No. 2010101030

Greetings:

- L-1 I wish to point out a significant problem with the design and associated environmental report for the subject development. The problem arises at the project's northwest extent. This is the southeast corner of the intersection of Torrey Pines Road, La Jolla Village Drive and North Torrey Pines Road. The present situation with conflict between bicycles and other vehicle traffic is ignored in the Draft Environmental Impact Report and its Traffic Impact Analysis. Furthermore, the design of proposed development appears to me to create a worse situation.
- L-2 First of all, on the UCSD side, where once upon a time Torrey Pines Road projected directly north and a section of the old road still exists, there is an implied bike lane that dumps cyclists into the intersection. On the southeast corner of the intersection there is a narrow section of sidewalk separating the intersection from the cul-de-sac of North La Jolla Scenic Drive. This injects cyclists traveling to the UCSD campus into a pedestrian crossing lane. There is a real problem with cyclists claiming right-of-way going ahead or to the left when motor vehicle traffic is turning right from northbound Torrey Pines Road to eastbound La Jolla Village Drive. It is a problem because the cyclist is coming from behind and on the right of a driver turning, which is not the direction a driver would be looking for a pedestrian. Furthermore, bicycles approach at a speed faster that any pedestrian. Some cyclists seem to claim right-of-way entering the intersection in the crosswalk without regard to the vehicle or pedestrian signal.

A modification addressing this conflict was made at the time La Jolla Village Drive was widened a few years ago. At the southeast corner of the intersection a firm curb rather than a handicap ramp was put on the side facing the cul-de-sac of North La Jolla Scenic Drive. This encouraged cyclists to dismount before the crosswalk. The situation was further improved but not resolved when "no turn on red" signage was put up with an exclusive pedestrian "walk" phase.

Nevertheless, the present situation is certainly not in conformance with traffic standards, and is fraught with risk for cyclists and motorists. But the plans in the DEIR (shown in

- L-1 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.
- 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.

diagrams but not discussed) have a mixed pedestrian and bike path leading right to the southeast corner of the intersection with no indication where a cyclist will be directed or how she or he will be protected crossing the intersection or controlled from becoming a hazard to other traffic in the process. It is identified as a bikeway and "New Bicycle and Pedestrian Path". Mixing cycles and pedestrians is not good practice. It looks like directing both mounted cyclists and pedestrians to a common curb cut/handicap ramp at the intersection will create an unsafe situation.

- L-3 Not only is there no discussion of the bicycle and other vehicle flow in the intersection, the DEIR and its Traffic Impact Analysis appear to take no account of the plans prepared last year by UCSD to modify that intersection to alter the pedestrian and bicycle movements (Bicycle and Pedestrian Master Planning Study, "Crossing at Torrey Pines Road and La Jolla Village Drive", pg.104). I understand that the results of that study are being further amplified in the ongoing revisions to the City of San Diego Bicycle Master Plan.
- L-4 It is the adjacent property owner's responsibility to provide the facilities for pedestrian, cyclist and motorist safety, such as curbs, curb cuts, wheelchair/pedestrian ramp for adjoining streets and ways. As the DEIR does point-out, this intersection is the junction of two Class II bicycle facilities which run along the project perimeter on two of three sides. It would seem to me that the Hillel Center for Jewish Life needs to address bicycle circulation issues more than with cursory mention.
- L-5 One of the Project Objectives (Sec. S.1.2) is said to be "reduction in vehicle use through enhanced bicycle and pedestrian facilities". These are not being advanced but rather, in the case of the intersection, ignored.
- L-6 In summary, I contend that the project design for the Hillel Center for Jewish Life, the Draft Environmental Impact Report and the DEIR's Traffic Impact Analysis are superficial and inadequate with regard to bicycle and traffic impacts.

Yours sincerely,

Daniel T. Allen

858 245 1586

danallen@alum.mit.edu

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

L-4

path, the parking lot/vehicular use area, and parkway strips along L 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 plan 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.
L-5 The project is providing a path along La Jolla Village Drive and L Jolla Scenic Drive North, which will be a benefit to both pedestria and bicycle circulation and reduce the need for vehicular movemen 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.
L-6 The project's Traffic Impact Analysis and Section 4.2 of the Ell adequately address all relevant traffic-related issues as require under CEQA.

	From: Sent: To: Subject:	LOUIS ALPINIERI < louaip@attnet> Sunday, March 10, 2013 3:43 PM DSD EAS UCSD HILLEL CENTER FOR IEWISH UFE (Project 212995)	Letter M	M-1	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
	the project over the past seve	it will be affected by the subject project. I have followed ral years and recently have had the opportunity to review 2013. I opposed this project when first proposed and upo pposition has increased.	the draft Environmental		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
M-1 M-2 M-3 M-4 M-5	My original opposition was based on my belief that the project was unsuitable for the proposed site as the area is primarily residential and the proposed project is not residential. The site closely abus UCSD and more recently, the under construction, UCSD, Ventuer Institute. At present, traffic and traffic noise in the area is growing more onerous every day. To consider the Hillel Center as having only a minor adverse effect is, at the very least, disingentions. While I appreciate the great lengths the project promoters have gone to paint a rosy picture I am somewhat disappointed in the honesty or lack thereof in the EIR report. This project has been considered and reconsidered on enough occasions. It has been consistently rejected. It is time to get on with a more suitable use of the property. I am certain that the project promoters can develop a more suitable location. In so doing, they may be assured of having a responsible facility that will be assured of future success by not having done damage to its surroundings. In summary, close review of the EIR convinces me that the proposed project will do damage and discredit Hillel and degrade the proposed site and surrounding environment. It is unsuitable,noisy and will make an already unsatisfactory and degrading traffic problem worse. While all traffic problems can be improved the impact of the improvements will probably be worse than the impact of the project(s). Lets not damage or destroy one of San Diegos more attractive neighborhoods.			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.	
				M-2	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
				M-3	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.
				M-4	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.
				M-5	See responses to comments M-1, M-3, and M-4.

N-1

Letter N

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

March 7, 2013

Dear Ms. Shearer-Nguyen:

The following are my comments in response to the recirculated DEIR for the UCSD Hillel Center for Jewish Life Project No. 212995/SCH No. 2010101030, I appreciate the opportunity to read and respond to this DEIR document.

Yours, Jessica F. Attiyeh 8961 Nottingham Place La Jolla, CA 92037

N-2

- N-1 *I don't understand how Hillel can validly lay claim to the house at 8976 Cliffridge Avenue as an alternative to the larger project (under Existing with Improvements Option) if that larger project is denied. The house has been illegally used as an office for several years per the LJ Shores Planned District Ordinance 1510.0303 and city zoning regulations which disallow office use in a Single Family residential zone. Using the house as an alternative would necessitate an amendment to the La Jolla Shores Planned Development Ordinance, and that in turn would require a zoning change. Without a zoning change it would remain in violation of codes.
 - * Provision for the Hillel house/office at 8976 Cliffridge Avenue [under "Existing with Improvements Option"] to remain as an office during construction if the larger project is approved amounts to flagrant disregard of LJ Shores PDO Ordinance which doesn't permit homes in a single-family (8F) zone to be used as offices. No other houses in the neighborhood would be allowed to function as an office.
 - * San Diego Municipal Code 1230402 states that a Temporary Use Permit is required for a temporary public assembly facility. If approved by the City Manager, it must meet the following conditions: a) The proposed use, for the limited period of time, will not be detrimental to the purpose and intent of the applicable zone; and b) The approval of the proposed use would result in no more than two Temporary Use Permits for the same use at the same location in any 365-day period. The DEIR does not explain why the proposed project has been allowed to exceed these limits nor why it should be allowed to do so in the future.

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.

1

N-2

N-3

N-3	* "Existing with Improvements Option" proposes Phase 2 to make permanent use of the 8976 Cliffridge house "to provide for religious programs in the existing residential structure" "and other improvements to the interior of the structure to bring the 8976 Cliffridge property into compliance with the Municipal Code for this use". If permanent use of this residence as a "UCSD Student Center" is allowed, then certainly other campus religious groups can seek permits for the use of other houses as well. Allowing either the larger project or this residence to be used in this manner would create a precedent for upwards of two dozen other "primarily religious" student organizations on the campus to use neighborhood properties for their own activities by similarly renting or buying homes that come up for rent or sale, joining together in order to make this financially feasible if necessary. This project therefore creates a slippery slope that changes the neighborhood character in ways that cannot be reversed. The DEIR does not explain how this one exception can be made and the other potential applicants denied.
N ₋ 1	* A desiration Council - Maximum Desiration and Handson at a Desidential Zone

- N-4 *. A deviation from the Maximum Paving and Hardscape in Residential Zones Requirement is also requested under the SDP to accommodate on-site parking for Hillel cars only. The DEIR does not take into account that the cul de sac at the end of La Jolla Scenic Drive North is currently heavily used both for other student and theater parking, as well as for turnaround space for cars mistakenly entering the road or wishing to exit parking spaces on La Jolla Scenic Drive North and head toward I-5, Gilman Drive, or La Jolla Village Drive. The DEIR fails to recognize that by removing these uses of the cul de sac, such traffic would be forced to drive further into the neighborhood in order to leave it. The DEIR does not address if and when this paving and hardscape would revert to its current configuration, thus relieving these traffic impacts, and who would be held responsible for this change, if 8976 reverts to private family status after Stage 1/2 is completed.
- N-5 *As the house at 8976 Cliffridge Avenue is currently owned by Hillel or a proxy, the DEIR fails to rule out or discuss implications of continuing the use of the house for "private family use" by a Hillel staff or leader or Rabbi, which would make it a de facto extension of the Project. Conversion of the cul de sac as is planned under the DEIR to facilitate parking for continued use during Phase 1/2 would facilitate this extended inclusion and explain why it is necessary to write it into the project at all.
- N-6 *The DEIR does not explain why a 6,500 square foot project is necessary if the small house would meet Hillel's needs as an alternative, unless expansion is planned for a time either "sooner or later"?
- N-7 * The DEIR fails to clarify what is meant by "primarily for religious purposes" and it does not show how this project satisfies that definition according to San Diego City zoning regulations and LJ Shores PDO codes. What specifically defines "primarily for religious purposes?" What percentage of an organization's total programs need to be specifically religious in order to qualify as "primarily religious" as opposed to a being a roughly equal mix of social and religious/spiritual activities? Is there a rubric of how many hours need to be spent -- per day -- per week -- per year to qualify a building as

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

2

N-4

N-4 (cont.)

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 culde-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.

N-5 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

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).

- 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.
- N-7 Please see response to comment N-1.

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, 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.

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 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 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 desserts, coffee, live music, comedy and fun, and is open 6 nights a week....

N-8

- *The DEIR fails to elucidate how Hillel's official mission focuses primarily on religious purposes. The Hillel of San Diego at UCSD website states:".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." These programs include
- -- serving the needs of individual Jewish students
- -- creatively engaging and empowering Jewish students through personal interactions and compelling programs
- -- nurturing intellectual and spiritual growth...
- -- 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.

There is no mention of prayer services in this mission statement. Hillel's stated purpose and Mission Statement are not focused "primarily on religious purposes." So how does the project warrant being allowed for primarily religious purposes?

N-9

*The mission statement acknowledges that students from all backgrounds are: "invited to participate in Jewish life on campus" (my underlining here.) This as well as its current name acknowledges that the facility is conceived of even by Hillel as being Universitystudent centered, and therefore it does not comply with codes relevant to uses in the Single-Family Residential zone.

N-10

* How does changing the name of this student center over the years prove that it is primarily for religious use? "The UCSD Center for Jewish Life" is just its most recent iteration, to bolster the claim that it is primarily a religious use and divert attention from the largely social focus needed to draw students. When first proposed it was simply a "Student Center", in 2004 it was "Hillel of San Diego"; in the 2008 MND it was still "Hillel of San Diego." It is reminiscent of the Clinton claim that "it depends on what the meaning of the word 'is' is."

In 2010 the architect Mark Steele, who has been working hand-in-glove with Hillel representatives since the start, himself publicly stated: "The facility really is primarily N-8

See response to comment N-7. 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. This comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response is required.

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 uses 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.

3

	simply a student center, study center, some office space, and that it is no longer to be used for any major gatherings whatsoever." This certainly clarifies that its use is not permitted, as under the LJ Shores PDO student facilities are not allowed in the La Jolla Shores Planned District.	N-11	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.
N-11	* The DEIR does not require a Conditional Use Permit (CUP) for a facility that is so close to homes that it can severely impact them, immediately and when Hillel chooses to expand its structures and its programs. Other neighboring religious facilities situated within residential areas (e.g., Church of the Latter Day Saints, and the University Lutheran Church dating from when the Catholic student organization was sharing its facility) either do have CUPs that strictly govern hours of use, numbers of gathered participants per event both indoors and on outdoor spaces, or are so distant from the nearest homes that CUPs are not needed to protect them from negative impacts. Why is Hillel allowed to avoid having these standards applied to its own facility when it is approximately 30 feet from facing homes? Without a CUP, what is to prevent Hillel from doubling the size and usage in the future, once the facility is built? We and our neighbors intend to remain here well past the 10 years Hillel's spokespersons say it will not expand. But they are not legally compelled to abide by this arbitrary timeline, nor does the DEIR specify future growth restrictions.		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
N-12	* I don't understand how the DEIR can justify parking plans it proposes. If the Hillel facility truly is "primarily for religious purposes" then it has to strictly adhere to parking requirements stated in the Codes. If, on the other hand, it wishes to provide fewer parking spaces, then it must claim to be simply a Student Center that is exclusively for Jewish students. However, then shouldn't it lose its right to build on a parcel coded as Single-Family residential?	N-12	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-
N-13	*The DEIR is in error when it states that parking would not be a significant issue. It does state that this project and the surrounding streets are in the campus parking impact overlay zone, which acknowledges that parking is indeed a significant issue.		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
N-14	* If, as Hillel has posited, the standards for places of religious assembly don't apply as regards their planned seating places per square feet of assembly area, then how can they simultaneously claim that the building is used "primarily for religious purposes" On the other hand, if Hillel claims it will be used "primarily for religious purposes" then the tand Development Code for places of religious assembly that specifies 1 parking space per 3 seats, or 1 per 60 inches of pew space, or 30 per 1,000 square feet of assembly area. Hillel provides only 27 parking spaces, and therefore does not comply with the 47 required spaces for their physical dimensions.		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.
N-15	* The DEIR fails to note that as a "primarily religious" facility it would be exempt from taxation. It does not compare it to neighborhood family homes that are used in parallel ways but are not exempt from taxation. Orthodox private homes are permanent structures and are essentially used for "primarily religious" purposes. They contain religious texts and ritual items used for ritual purposes. As did my own Jewish orthodox grandfather,		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

N-12 (cont.)

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.

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?

* The DEIR does not reference the description of Hillel's architect, Mark Steele, who publicly stated in October, 2010, that "The facility really is primarily simply a student center, study center, some office space, and that it is no longer to be used for any major gatherings whatsoever." Even on Mr.Steele's firm's current website, he categorizes it under "institutional" and not as "sacred."

N-16

N-19

- N-17 * The DEIR specifies showers, ostensibly for bikers to use per the presentation by a Hillel spokesman at a La Jolla Permit Review meeting this fall., However, wherever the students live, on campus or nearby, they presumably have showers at home. If they regularly bike to or around the campus between classes and to attend other activities, they manage without mid-day showers every day. Showers would not be necessary at a student center unless intensive physical activities (like martial arts or dances) programs are held there regularly (not a primarily religious activity!) or unless it is projected that students may sleep there on occasions such as studying late into the night or during Succoth when they might sleep in the outdoor grounds in the outdoor Succah. These would involve hours of use beyond what is "promised" by Hillel however conditionally.
- N-18 *The DEIR does not specify how perimeter lighting will impact facing homes, either along La Jolla Scenic Drive North or across on La Jolla Scenic Way. It does not provide protection from external lighting or the spillage of internal lighting onto the facing homes.
 - * The DEIR specifies monitoring procedures for construction. But it gives no specifics about who will provide ongoing, accurate monitoring of hours, numbers of people, noise levels, parking on neighborhood streets, etc once the facility is in use. What are the proposed effective enforcement policies if monitoring is nonexistent or inadequate to protect homes from being negatively impacted?

- 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.
 - 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.

N-18

N-20 *I can't tell from the DEIR who owns the project currently, or who actually owns 8976 Cliffridge Avenue. It is listed as a single family residence, but I have never seen a family living there since it became offices, nor has Mr. Robert Marshall, in whose name the deed was placed in 2002, been a resident of the house or listed in the phone book.

- N-21 *Curb cuts necessary for entry and departure of cars or services or shuttle busses on La Jolla Scenic Way have historically not been permissible where they are stipulated in the DEIR. Heavily traveled lanes coming from LJ Village Drive and turning onto LJ Scenic Way, especially during rush hours, would exacerbate a collision hazard for cars entering and leaving the facility. Would u-turns be permitted to allow cars to turn north/back toward LJ Village Drive? This would compound unsafe conditions on a portion of roadway heavily used by neighborhood and nearby residents both exiting the neighborhood from LJ Scenic Drive North and coming home after turning left onto La Jolla Scenic Way from westbound La Jolla Village Drive.
- N-22 * The traffic impact of the newly built Venter Institute was not factored into the traffic study, and it will add significantly to traffic flow in all directions. It does not account for the 3 buildings yet to be built as part of that Institute, and which will add further to traffic impacts, Moreover, the DEIR does not take into account that cars exiting Venter from the Torrey Pines Road exit point, especially at rush hour, and needing to reach I-5 North or to go eastward on La Jolla Village Drive, will have either to cut sharply across southbound traffic on Torrey Pines to make a u-turn at the Glenbrook light or will choose to avoid traffic and stoplights altogether on Torrey Pines by turning left on Glenbrook Way into the residential neighborhood, and left again onto Cliffridge Avenue, then turning right onto La Jolla Scenic Drive North at the back of the Hillel facility. From there they would turn left onto La Jolla Scenic Way adding to the heavy flow of traffic entering the larger neighborhood from La Jolla Village Drive both eastbound and westbound. The DEIR does not address the impact on neighborhood streets and the potential for accidents at several points (especially on LJ Scenic Way when cars or bikes or walkers would be leaving Hillel). It must be noted that many cars already use this "shortcut" at all times of day precisely to avoid Torrey Pines traffic and delays. Adding Venter traffic will exacerbate the problems.

N-23

* LJ Shores PDO 1510.0301 requires that the Design Manual shall be used in evaluating the appropriateness of a development for which a permit is applied for under the LJ Shores PDO. Among its stipulations: "Visually strong buildings which contrast severely with their surroundings impair the character of the area." It goes on to say that "Structures shall conform or complement the general design and bulk of buildings in the surrounding and adjacent areas." The proposed Hillel building is strong and contrasting in style and materials and roof line and is distinctly different from surrounding homes. The size, modern institutional design, building materials, and architectural elements cause the student center to stand out from the existing residential neighborhood. Note that the neighborhood residences that would directly face the Hillel structure across a narrow street are single-story single family residences of less than 3,000 square feet with the sole exception of a single one-room addition above one garage. Hillel proposes a facility in

N-20 This comment does not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response is required.

N-21 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. The recirculated EIR was updated (December 2013) to include N-23 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

	secure of 6 000 secure. Fragacially a secure and all a feet a secure of 20 feet at the	N-23 (cd	ont.)
	excess of 6,000 square foot with a soaring peaked roof that extends 30 feet above the finished grade.		environment would be consistent with the neig Overall, the EIR addresses the project's
N-24	*Senior City Planner Michael Stepner of the San Diego Planning Department responded to a City Property Department investigation in June, 1977, concerning the property currently covered by the DEIR which was being investigated "to determine its availability for sale or lease." The request clarified that "The current zoning within the La		neighborhood character in detail concluding that the visual appearance would be less than signific
	Jolla Shores Planned District regulations is single family as it continues to be now. Mr. Stepner replied: "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."	N-24	Any specific request or coordination made in any bearing on the proposed project. This com any substantive issues related to the adequacy
N-25	* The proposed structure will block "public and visual" sight lines, which are specified in the LJ PDO as an element required for retaining community character.		the EIR. No further response is required.
N-26	* The DEIR biology report states that "no active nests of any kind were detected during the survey." However, a 2007 National Park Service report giving guidelines for adequate surveys in a raptor nesting area 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" were required, over multiple days. This is because raptors often fly far from their nesting	N-25	The project site does not maintain any public visual quality impacts of the Phase 1/Phase 2 pr Section 4.12 of the EIR, including public views regulations from the LJPDO. See response to co
	areas and may not be visible there for long periods as they forage for food. Therefore it is unclear whether 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. Breeding and nesting periods in California include March and April but observations as provided on the DEIR chart were made in December and February and July, and lasted less than one hour in duration on each of these days.	N-26	There is no requirement under the City's guidelines to observe the project site for four days. According to the City's Land Developme Guidelines (amended 2012):
N-27	*The section on biological impacts in the Executive Summary of the DEIR says that: "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" "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." However the DEIR does 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 3 structures		Surveys, for state or federally listed sensitive covered species older than 24 months must as appropriate, to accurately reflect resou Surveys should be done at the appropriate to detect presence/absence of sensitive surveys are not done at the appropriate that and the potential for occurrence is mode (based on historical knowledge, singletermination by the biologist, etc.), the concluded that their presence exists on the
	and outdoor patio planned for the larger project, with the attendant commotion and noise disruption will continue significantly even after grading is complete. Therefore the DEIR assessment of insignificant impact to raptors is misleading and possibly in error.		As detailed in EIR Section 4.3, no state or feder MSCP-covered species were detected, nor harmonic formatter and the section 4.3 are section 4.3.
N-28	*That section goes on to state that: "If project grading is proposed during the raptor breeding season (February 1–September 15), the project biologist shall conduct a pregrading 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		occur on-site. As previously detailed, raptors birds have the potential to nest in the eucalyte eastern portion of the site. Out of an abundance conformance to City standards, biological

eighborhood character. t's consistency with that impacts related to

ificant.

1977 does not have mment does not raise acy and/or accuracy of

c sight lines. Potential project are analyzed in wsheds and applicable comment N-23.

s biological resource ur hours over multiple nent Manual - Biology

> itive or MSCPist be updated, ources on site. te time of year e species. If time of year, derate to high site records, nen it will be property.

erally listed sensitive or have the potential, to s and other migratory lyptus trees within the ince of caution, and in surveys have been updated.

Biologists conducted a general biological survey site visit in May 2013 to update fieldwork conducted in 2010, 2007, and 2003.

N-26 (cont.)

Although no raptors or nests were observed during the multiple biological resource surveys conducted for the project, the trees onsite 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.

N-27 See response to comment N-26.

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 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.

N-28 (cont.)
N-28 (cont.) Adherence to this mitigation measure would ensure that impacts to nesting raptors would be less than significant.
nation renters would be less than significant
nesting raptors would be less than significant.

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 incubation of raptors on or within 300 feet of the development is therefore likely.
* The negative impacts of DEIR estimates of use are misleading. The DEIR's "conservative estimates" of daily use of 100 persons per day suggests compatibility with the residential neighborhood whereas family homes whose daily uses are between 4 and 8 persons per day begin only about 30 feet from the project site and extend throughout the neighborhood.
* In fact, the DEIR projects a total of 200 "Person Trips" (Walk/Bike or Drive) per day to and facility, and 200 Person Trips leaving the facility. This raises the likelihood that the facility will be more heavily used, and the neighborhood more heavily impacted, than is suggested by the image of "small study groups" and other such misleading terms.
* If the DEIR estimates are correct, and if only 15-30 folks will be coming to small groups on a daily basis, what is the need for a 6500 square foot project? The DEIR does not say whether several such "small groups" will be meeting at the same time. And it does not account for growth in the number of Hillel attendees or increase in programs over time.
*The DEIR does not account for why a 6500 square foot project necessary if only 15-30 people are to be there at one time. Most neighborhood homes would accommodate that number, and they have only between 2000 and 3000 square feet; these homes have kitchens, and three bedrooms or more to accommodate several small study groups at one time, and a family room to accommodate a library-cum-chapel sized room as well. Meetings of more than 30 folks being infrequent, according to the DEIR, they could be held on campus as they have been to date along with Shabbat services that are already promised by Hillel in the DEIR. In fact, the DEIR never states the maximum capacity of the facility, so there is no way to be certain that much larger events, including Shabbat services and visiting speakers and the like, can't or won't be held there.
* Usage figures in the DEIR are misleading and even false. The DEIR states that " many users of the facility will come from UCSD just north of the Hillel Facility" And that "It is expected that many patronswill walk from UCSD to attend the programs held at the site." These are simply "expectations," so they cannot be relied upon to give an accurate picture of negative impacts.
*The DEIR is misleading in that its projections of foot and car traffic cite figures from UCLA and UC Santa Barbara, omitting the fact that the UCLA Hillel facility is in a R-4 zone (multiple-dwelling residential zone per Los Angeles zoning definitions) making that Hillel facility inappropriate for accurate comparison. The DEIR also omits the fact that and that UC Santa Barabara's Hillel facility is in an area that that city zones SR-H-20

N-29 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.

N-30	See response to comment N-29.
N-31	See responses to comments N-6 and N-11.
N-32	See responses to comments N-6 and N-11.
N-33	This comment represents the commenter's opinion; however, for a detailed response related to project trip generation see response to comment N-30.
N-34	See response to comment N-30.

		LNIOF	
	(High Density Residential, 20 dwelling units per gross acre). The DEIR fails to mention	N-35	See response to comment N-30.
	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	N-36	See response to comment N-30.
	comparison. Both of these Hillel facilities have densely inhabited multiple-dwelling apartments housing students within yards of the facility. And the UCLA Hillel facility	N-37	It is not clear if the commenter is asserting that the EIR and Traffic
	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.		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
N-35	*The DEIR fails to consider that most junior and senior and graduate students live in off-		information.
	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.		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
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		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
	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		low amount of vehicles would not result in a significant traffic impact on La Jolla Scenic Way.
	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.		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.
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 ingoing and		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.
	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	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
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 paper street		construction noise that exceeds 75 dB(A) L_{eq} at a sensitive receptor would be considered significant.
	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.		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) $L_{\rm eq(1)}$. Grading would occur over the entire site and would not be situated at any one location for a long period.
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		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.

	construction period, given that the project completion is not expected until 2015/2016. Over a two- year period or longer this will not be a "short-term" impact!	N-39 N-40	See response to comment N-38.
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-from-center distance posed in the noise study will not protect nearby houses from intrusive noises at this very close distance.	N-40	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
N-41	* Regarding Ordinance 1510.0304(b)(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.		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
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.		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.
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?		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
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?		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.
		N-41	The project is consistent with City Land Development Code and specifically, the La Jolla Shores Planned District Ordinance. Section

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4.1 (Land Use) and 4.12 (Visual Effects and Neighborhood Character) of the EIR discusses the project's consistency with all

N-41 (cont.)

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.

- N-42 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.
- N-43 See response to comment N-5.
- N-44 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.

0-1

Letter O

Richard Attiyeh 8961 Nottingham Place La Jolla, CA 92037

March 8, 2013

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

SUBJECT: UCSD Hillel Center for Jewish Life - Project No. 212995

Dear Ms. Shearer-Nguyen:

O-1

0-2

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 S.1.2 Project Objectives

• 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 other colleges are as follows: Muir College – 1/2 mile; Thurgood Marshall College – 3/4 mile; Eleanor Roosevelt College – 1 mile; Warren College – 1 mile; Sixth College – 1 mile. And the North Campus Housing intended primarily for transfer students is approximately 1 and 1/4 miles from Site 653. What this makes clear is that this location for the Hillel student center will not promote "walkability" for Hillel students and it will generate substantial amounts traffic and on-street parking in this single family neighborhood.

Section 4.1 Land Use

The EIR points out that the La Jolla Shores Planned District allows "churches, temples, or buildings of a permanent nature, used primarily for religious purposes" to be located within a single-family neighborhood. It is clear, however, that although Hillel has a religious affiliation, it would not be used primarily for religious purposes. Most of its proposed activities make clear that it is a student center.

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.

	O-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.
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		O-3	See response to comment O-2.
O-3	• The location of churches, temples, and other buildings for religious use in single family neighborhoods is considered to be appropriate because they serve the needs of the residents of those neighborhoods. The people who would use the Hillel student center are not residents of the La Jolla Highlands neighborhood. Rather, they are students at UCSD and virtually none of them live in this neighborhood. It is clear that this student center, even though it has a religious affiliation, would not serve the	O-4 O-5	Any specific request or coordination made in 1977 does not have any bearing on the proposed project. This comment does not raise not raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response is required. See response to comment O-1.
	community in which it would be located.	0-6	As detailed in Section 3.0 of the EIR, "Hillel currently uses the
O-4	• As has been pointed out by others, when Site 653 was created, it was intended to be open space. This was supported in 1980 by the La Jolla Shores Association when Mark Steele served as its chairman. In 1977, Michael Stepner, a Senior Planner in the City's Planning Department stated that it was not suitable for development and should be maintained as a landscaped traffic island. It has long been the view of La Jolla Highlands residents that this site should remain open space to serve as a buffer between UCSD and the neighborhood. To build a student center on this site would crode this critical boundary between the University and this community.	0-0	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
O-5	• The draft EIR uses the Hillel student centers at UCLA and UC Santa Barbara as models for assessing the impact that the proposed UCSD Hillel student center will have on its surrounding community. What the EIR fails to point out, however, is that both of these student centers are located in mixed use neighborhoods. Certainly, if there is a lesson to be learned from these examples, it is that the UCSD Hillel student center should be located in a mixed use neighborhood. Indeed, none of the other University of California Hillel student centers are located in single family neighborhoods.		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
O-6	 The draft Environmental Impact Report states that the "Existing with Improvements" option is an allowable use of the 8976 Cliffridge Avenue single family house under the La Jolla Shores Planned District zoning. This is incorrect. During City Council discussions of the original Hillel student center proposal it was made clear (1) that the 		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.
	use of this house for student center administrative uses was not allowable in a La Jolla Shores single family neighborhood and (2) that the house should be returned to single family use when the final decisions about the Hillel proposal are reached. The fact that the Hillel has a religious affiliation does not provide a basis for using a single family house for administrative purposes.		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.
	Section 4.2 Transportation/Circulation/Parking		
O-7	 The narrowing of La Jolla Scenic Drive North would create serious problems for traffic on this street. At the present time, the street is already too narrow to comfortably accommodate two-way traffic and parking on both sides of the street. This is particularly problematic because of the acute angles of the entrances to this street from Cliffridge Avenue and from La Jolla Scenic Way. The problem would be 		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.
	compounded by the increase in traffic flow generated by the Hillel student center and by the increasing number of drivers who use Cliffridge Avenue and La Jolla Scenic Drive to avoid the long wait at the corner of Torrey Pines Road and La Jolla Village	O-7	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
	2		classified as a Local Street in the La Jolla Community Plan. Per the City's Street Design Manual, Residential Local Streets are typically

O-7 (cont.)

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.

Drive. The argument that the width of a narrower La Jolla Scenic Drive North would still comply with City regulations ignores the reality that is evident to anyone who, like me and other neighborhood residents, regularly has to use this street.

- O-8 The location of the entrance to the onsite parking on La Jolla Scenic Way also creates a serious traffic problem. Throughout the day, there are large numbers of cars turning south from La Jolla Village Drive onto La Jolla Scenic Drive North. Having cars entering and exiting the Hillel parking lot would both create congestion and increase accident risk. It was for good reason, when Site 653 was created, that entrance to the site was limited to La Jolla Scenic Drive North and curb cuts along La Jolla Scenic Way were prohibited.
- O-9 If Hillel's contention that its student center would be used primarily for religious purposes were to be accepted, then Hillel would have to increase its onsite parking to be in compliance with City regulations. For religious facilities that do not have fixed seating, the requirement is that 30 onsite parking spaces be provided for each 1,000 square feet of assembly area. Given that the Hillel student center would have between 2,000 and 3,000 square feet of assembly area, its proposed 27 spaces would be substantially less than the 60 to 90 spaces that would be required by the Municipal Code.
- O-10 Hillel supporters have argued that the student center would not function as a synagogue and it should not be required to meet the code requirement of 30 onsite parking spaces for each 1,000 square feet of assembly area. But if the number of seats shown in the Building Plan is used as an indication of how many people can be accommodated by the proposed facility, it is clear that the proposed 27 on-site parking spaces fall well short of the number required by City regulations. Figures 3.5 and 3.6 in the EIR show over 120 seats in the Building Plan. If Hillel contends that the proposed student center is a religious facility, then it would require one parking space for each three seats or more than 40 on-site parking spaces.

Section 9.0 Project Alternatives

- O-11 The draft EIR suggests that Hillel considered alternative locations. The locations they have rejected all have the following major advantage: None of them are in a single family neighborhood. Possibilities east of the campus would be near plentiful student parking and would be near campus shuttle stops. In many respects the relationships between these sites and the UCSD campus would be similar to the relationships between the UCLA and UCSB Hillel student centers and their respective campuses. It is clear from the discussion of this issue in the EIR that Hillel has not considered a reasonable range of alternatives to Site 653.
- O-12 Another alternative is Site 675. Although this site may not be perfect in every respect, it has the advantage of providing a location adjacent to the campus that is convenient for UCSD students and is not in a single family neighborhood. I believe

O-8A 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.

O-9 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

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O-9 (cont.)

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.

0-11

O-10 See response to comment O-9.

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

0-12 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, the environmental issues that would need to be dealt with are not as significant as the including to biological resources. See also response to comment Odraft EIR suggests. This site deserves more serious consideration 11. Thank you for providing me with the opportunity to comment on the draft EIR. Sincerely, Richard Attiyeh

P-1

Letter P

March 10, 2013

P-2

Re: UCSD Hillel Center for Jewish Life, #212995, dEIR

To Whom It May Concern:

As a member of the community directly impacted by this project, I have a number of comments in response to the dEIR.

- P-1 Visual Effect/Neighborhood Character: This structure, both in scale and design, will have significant negative impacts on the neighborhood. Its size and setback are clearly out of proportion to the singlefamily homes on La Jolla Scenic Drive N. The dEIR mentions the La Jolla Playhouse on campus and the townhomes east of La Jolla Scenic Way, but these are not appropriate comparisons as they are completely not visible from the proposed Hillel site. This project defies the design principles of the LISPD Ordinance and the La Jolla Shores Design Manual.
- Traffic: This project will have a serious, and potentially dangerous, impact on traffic. With the incoming Ventner Institute, and the 3 other building planned on that site, the already congested traffic in the area is bound to increase. The dEIR make no mention of this massive structure. The neighborhood already deals with increased traffic from students, and people taking a shortcut to get to the freeway, and this P-3 project will surely increase this problem. The dEIR uses faulty data gathering techniques, relying largely on a survey, to state that students attending the Hillel will mostly be walking, and those that drive are likely to carpool. We all would like to think that would walk to more places, or carpool with friends, but the reality is often very different. UCSD students are spread far and wide, many living off campus, and P-4 are certain to drive to the Hillel, especially for evening and night gatherings. Most importantly, the traffic hazards: 1) The entry on La Jolla Scenic Way is an accident waiting to happen. With two lanes of left turn traffic coming from La Jolla Village Drive, the entrance to the Hillel comes far too quickly, and the entrance is far too close to the sharp right needed to turn onto La Jolla Scenic Drive N. 2) The P-5 proposed Right-of-Way Vacation plans to narrow La Jolla Scenic Drive N. This street is already heavily

impacted with cars, bicyclists, skateboarders, and pedestrians, Given the cars parked on both sides of

the street, there is already barely enough room for two cars to pass, and more defensive driving is a

must with any bicyclists or pedestrians. A narrower street would make for a hazardous situation.

- P-6 Parking: This is a major problem for the Hillel. If they claim to be a religious organization, they do not meet the parking requirements. If they are a student organization, they do not belong in our singlefamily neighborhood.
- P-7 Noise: The dEIR states that the Hillel does not expect more than 100 people at any gathering, but the facility can clearly hold many more than a hundred people. Any organization desires to grow and expand, and the Hillel is no different. There is no mechanism to monitor the number of people attending events. There is also significant noise related to people coming and going, car doors closing, after hours

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.

P-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.

clean up and trash dumping, and the possibility of outdoor gatherings in their courtyard, such as the construction of a sukkah during the Sukkot festival.

Thank you for your time and response,

Neha Bahadur 8881 Nottingham Place La Jolla, CA 92037 P-2 (cont.)

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.

P-3 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

P-3 (cont.)

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.

- P-4 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.
- P-5 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.

P-6

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.

P-6 (cont.)

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.

P-7 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.

P-7 (cont.)

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 courtvard 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.

Letter Q

John A. Berol 8521 Avenida de las Ondas La Jolla CA 92037

Saturday, January 26, 2013

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

Document: Recirculation Draft Environmental Impact Report SAP No.: 24000958 Project Name: UCSD HILLEL CENTER FOR JEWISH LIFE Project Number: No. 212995 / SCH No. 2010101030

Ladies and Gentlemen:

Q-1 Please see my comments on the <u>attached page</u> addressing accuracy and completeness of the above referenced document.

In 3 points I delineate lack of accuracy and lack of necessary analysis including:

- Fails to address issue of whether project would be <u>primarily</u> for religious purposes.
- . Is in error as to precedent.
- · Makes wrong interpretation of La Jolla Shores Planned District Ordinance.
- · Fails to ask if project is a House of Worship.
- Fails to <u>observe</u> that known Houses of Worship do not exclude people from worship on the basis of university affiliation.

Thank you for your attention.

NA. Berse

Sincerely,

John A. Berol

Q-1 This comment is an introduction to comments that follow. No further response is required.

	UCSD HILLEL CENTER FOR JEWISH LIFE, Project 212995 / SCH 2010101030 Letter of January 25, 2013 from John A. Berol to E. Shearer-Nguyen RE: Recirculation Draft Environmental Impact Report SAP No.: 24000958
Q-2	The recirculated draft Environmental Impact Report (RDEIR) erroneously omits the word "primarily" as a modifier of the phrase "for religious purposes" when it says the La Jolla Shores Planned District permits "churches, temples, or buildings for religious purposes" (page 2-13). The Executive Summary (page S-2) correctly quotes the applicable Code as follows:
	"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	Point 1: The RDEIR fails to directly address the question of whether the proposed project would be <u>primarily</u> for religious purposes. This failure is exemplified by removal of the word "primarily" from the RDEIR description of what is permitted (page 2-13). Certainly the proposed project would have religious purpose (pages 3-3 and 3-4), but would it be buildings used <u>primarily</u> for religious purposes? The RDEIR provides no analysis and thus no answer.
Q-4	Point 2: In reality, it is not feasible for government to analyze the magnitude of an applicant's religious use of buildings. If the Code's criterion were solely the primacy of religious purpose, then as a practical manner <i>any</i> building would satisfy the Code once an applicant declares the trump card of religious purpose. That would include all UCSD religious organizations wishing to convert existing Single Family Homes to administrative offices as well as corporations wishing to build religious corporate retreats in La Jolla Shores. The RDEIR is in error when it opines at page 6-3 that there would be no harmful precedent from interpreting the Code this way so as to approve this specific project.
Q-5	Point 3: The solution to the problems described above is to correctly interpret Code Section 1510.0303(e) which permits: "churches, temples, or buildings of a permanent nature, used primarily for religious purposes." Applicant is looking only at the phrase after the word "or" which, when taken out of context, would make it impossible to deny any project where the applicant makes reference to religion. This is a wrong interpretation. It would make the words "churches" and "temples" superfluous, and by ignoring those words it disrespects the City Council which put those words into the Code for a reason. The phrase "buildings of a permanent nature, used primarily for religious purposes" needs to be interpreted in the light of the company it keeps which is the phrase "churches, temples." Looking at all the words in context one can see the correct meaning is to permit Houses of Worship by whatever name they may have: church, temple, synagogue, mosque, or other. "Or other" does not mean "or anything religious" it means "any other House of Worship" as understood by analogy from the names of those Houses of Worship which are listed before. The RDEIR fails to ask if the UCSD Student Center proposed by Hillel would be a House of Worship. It fails to observe that an attribute of know Houses of Worship is that they are open to all respectful members of the entire community – not just university students. That is in sharp contrast to the proposed UCSD Student Center which would apparently be for UCSD students only. Being only for students, the proposed project is an institutional use and not a House of Worship permitted in the Single Family Zone.

- Q-2 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.

Q-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.

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 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.

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.

		R-1	This sentence was revised in the recirculated EIR (December 2013):
	Responses to the DEIR for the UCSD Hillel Center for Jewish Life Helen Boyden 8525 Nottingham Place La Jolla		West of the project site, across Torrey Pines Road, lies vacant land that is planned and permitted for institutional uses (owned by UCSD).
	Sent March 11, 2013		It should also be noted that the baseline physical conditions, or
R-1	1. The neighborhood character section: 4.12.1.2 on page 4.12-2 states:		environmental setting, are detailed as they existed when the NOP was issued (2010); there was no ongoing construction at that time.
	"A large undeveloped lot belonging to UCSD is located across Torrey Pines Road to the west"	R-2	The Venter Institute project was added to the cumulative projects within the recirculated EIR (December 2013). Please see EIR Section
R-2	On the contrary, this land is currently under heavy development. The land to the west across Torrey Pines Road has been under construction for more than a year. At this writing there are elements estimated to range in height from 30' to 50'—the J. Craig		4.2.3.1(a) and Chapter 7 for analysis that includes this project.
	Venter Institute. This property, owned by UCSD, is also slated to be developed by several more projects in the future. Current plans call for a driveway to exit onto Torrey Pines Road and one onto Expedition Way. The Venter Institute is scheduled to open this fall- 2013. It is anticipated that the Venter Institute can house more than 100 staff-not to mention visiting staff and students from UCSD. There is potential traffic from visitors in the nearby bioengineering community. It has a large underground parking garage which will allow even visitors from the campus to arrive by car.		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
R-3	A Hillel representative has been quoted in the La Jolla Light of March 7, 2013, as opining that the Venter Institute had done its own traffic study and the community should seek this out. This is not acceptable.		project has been constructed. Thus, traffic generated by this cumulative project was included in the near-term condition.
	This property should have been included in section 7.0 Cumulative Impacts analysis and in the Traffic Study 9.0 Near-Term Cumulative Projects Discussion. The property also should have factored in the 2030 year projected traffic study as there are several other UCSD properties on this site that will be developed. The Venter Institute and future development will affect traffic flow on North Torrey Pines Road, La Jolla Village Drive, Torrey Pines Road, Glenbrook Way, Cliffridge Avenue and La Jolla Scenic Drive. The last two contain single family homes and are standard narrow streets. Glenbrook Way also has single family homes but is slightly		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.
	wider. The traffic study is dated January 11, 2012. It is outdated and incomplete. Its conclusion can not be relied upon. It needs to be revised to include additional scenarios.	R-3	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
R-4	2. Section 6.3, Potential for Setting Precedent lacks discussion on purchasing and using already developed single family residences in the Shores and other nearby areas covered by the La Jolla and University Community Plans. Residential properties come onto the market frequently in the nearby neighborhoods. There have been open houses for two different properties in the last two weekends. Hillel is currently using the property at		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
	DEIR UCSD Hillel Center for Jewish Life Page 1 of 2 Helen Boyden		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.

R-3 (cont.)

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.

R-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 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.

R-5

8976 Cliffridge, a former private residence, which was purchased for its use. Real estate agents frequently contact homeowners in search of properties for sale.

There are currently about 60 student groups in the "Spiritual" Category listed on the UCSD website. There may well be other religious groups which do not register as student groups on the website. Hillel does not list itself as a registered student group. While most groups are no doubt small without the financial resources to purchase and convert or develop properties, there might be some other well-funded religious groups catering to students that are unregistered at UCSD as well. There is also the possibility that several could band together in a consortium.

- R-5

 3. Hillel says it is erecting a permanent building for religious use. Its setbacks are not comparable to those of nearby religious institutions on La Jolla Scenic Drive.

 Congregations Beth El and Adat Yeshurun, located from ½ mile to ½ mile from the Hillel site are situated well back from the Public Right of Way. Torrey Pines Christian Church is located about a mile away and is also located well back from the road. Mature landscaping and land configuration obscure these buildings.
- R-6
 4. At several places in the DEIR, Hillel states that it wishes to be located near the southwestern corner of the UCSD property. With today's UCSD configuration, student classes and housing are no longer concentrated in the southwestern part of the campus. Dorms and teaching facilities are also located long distances away in the northern and eastern sections of the campus. UCSD has developed a sophisticated shuttle service going clockwise and counterclockwise around the campus interior. It also provides shuttle service for UCSD students throughout nearby communities. San Diego Transit runs the 200 series routes throughout nearby areas, making a connections to UCSD.

These transit situations make other locations potentially just as convenient as one in the southwestern corner of the UCSD campus.

DEIR UCSD Hillel Center for Jewish Life Page 2 of 2 Helen Boyden 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.

R-6 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).

S-1

Letter S

From: Jeffrey Broido <jhb146@columbia.edu>
Sent: Friday, March 08, 2013 10.44 AM

To: DSD EAS

Subject: UCSD Hillel Center for Jewish Life (212995)

Flease email me to confirm receipt of this email.

Attention

E. Shearer-Nguyen, Environmental Planner City of San Diego Development Services Center

COMMENTS ON DRAFT EIR

I am a long time resident of the area affected by this proposed project, having lived in the same house on RobinHood Lane for some 49 1/2 years. My children were born here, attended the local public schools and one still resides in the area with his family. We have been here since before UCSD construction started in its Torrey Pines location. I have been active in support of UCSD activities and this neighborhood is a major "walk to work" faculty enclave for many of my neighbors and fineds. At the same time, my neighbors and I have worked diligently over the years to maintain the residential character of the neighborhood. That includes ensuring that "fraternity houses", student boarding houses etc. did not cross the effective boundary formed by La Jolla Village Drive and Torrey Pines Road. When they did, we were able to have them removed. Until the subject project came on the scene.

In looking through the EIR and its appendices, I am struck by several omissions in the review

- S-1 First, in general, I am concerned about the completeness of the amended EIR, when the Venter Institute, its planned extension and the other facilities to be developed right text to it. I are not even mentioned in the study. Why have these things been overlooked or omitted? It twold seem that they should have a major impact on many of the environmental consequences of the project.
- S=2 Secondly. I have a particular concern about the total lack of mention of the impact that the Venter Institute will have on traffic in the project area. It will add to the traffic entering the morth end of Torrey Pines Road. With the current plan of forcing that traffic to make a right turn on exit, and then of course a uctuar if they are to go north or east, the tie up at Torrey Pines and La Jolla Village will only increase. To avoid the tieup at the intersection of TP, TPN and LJVillage, where there is a no turn on red, traffic is already detouring from northbound TP Road, onto Eleptrook and then Cliffridge and then past the proposed site. This is traffic that travels fast for a neighborhood aftery, le should enter in that 40 MPH and above, hardly comforting for residents with kids of whom there are many. With the proposed vacation of some of the road width on LJ Scenic Drive, this in my view will become an even more serious

Mostly what I cannot understand is how these and other impacts of the Venter Institute and the imminent future development of other major facilities in that immediate area as well as the planned future expansion of. Venter, can have been entirely omitted in the Traffic Study presented in the plan.

Thirdly, I am concerned that there seems to be no mention or regard for the fact that traffic is already using Cliffridge Avenue as a byposs to the no-turn-on-red signal at the north end of Torrey Pines Road. With this traffic ultimately making a left turn onto LJ Scenic Way from LJ Scenic Drive, passing in the pathway of exiting traffic from the proposed facility, aren't we creating a real mass in the neighborhood. Add to this the narrowing of LJ Scenic Drive should the wacation of Right of Way be approved.

I would appreciate your attention to these questions and a response.

Sincerely.

S-3

Jeffrey H Broide

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.

- S-2 See response to comment S-1.
- S-3 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.

T-1

Letter T

M and J. Chrispeels 8703, Glenwick lane La Jolla, CA 92037

La Jolla, CA, March 5, 2013.

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

lost with each of the Proposed Alternatives?

DSDEAS@sandiego.gov

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

Dear Ms. Shearer-Nguyen,

T-1

T-2

T-3

T-4

T-5

Thank you for providing the Re-circulated Draft EIR for the UCSD Hillel Center for Jewish Life, Project 212995 – previously known as Hillel of San Diego Student Center II. Please see our comments addressing the aforementioned document.

There is no doubt that the Hillel Foundation has designed a smart-looking Student Center. Unfortunately, it is unclear from the dEIR, what portion of the proposed site is currently owned by the applicant and what portion is being requested in the proposed Right-of-Way vacation.

Hillel's stated purpose is to serve the needs of those Jewish UCSD students who wish to avail themselves of the various services it will offer. The most important question is what the impact of the Student Center will have on the residential neighborhood in which it is situated. Does the character of the building blend with the neighborhood? Are three buildings clustered together around a central courtyard (that appear as one large 6,500 square foot building) consistent with the approximately 2,000 square foot homes across the street? Is a student center that generates at least 200 daily trips with regular hours of operation between Monday through Friday from 9am to 10pm consistent with the use by a single-family home located directly across the street? Is the Student Center likely to be a harbinger of things to come, such as other religious organizations acquiring properties and turning them into student centers or offices? Will there be a significant impact on

parking and on the adjacent residential streets? How many parking spaces will be

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 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.

T-2 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.

T-3 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.

T-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

T-4 (cont.) 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.
T-5 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.
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

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 owneroccupied 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 singlefamily 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

3. 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.

Maarten and Janet Chrispeels

T-6

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.

T-7

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

T-7 (cont.)	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 U

Costello 3/11/2013 Page 1 of 3

From: Michael Costello 626 Wrelton Dr. La Jolla, CA 92037 emsmike@san.rr.com 11 March 2013

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

U-1

 It is shocking how a proposed project with this many problems could be advanced thought the permit process. The shear 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

parking spaces for an illegal use must not be allowed. All requirements for minimum

is not legal and must be stopped. That is, Phase 1 must not be allowed. Additional

landscaping and maximum hardscape must be observed for this single family zone.

U-2

U-3

2 70 6 6 1 6 4 0 1 6 7 7

The four findings for the Right-of-Way Vacation can not 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 <u>public</u> benefit. There will be a lose of on street parking and the lose 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

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.

U-4a	Costello 3/11/2013 Page 2 of 3 unexpected blind corners. The street was constructed as designed to be safe, these alterations will be unsafe. 4. The placement of a student center is a single family zone is not legal.	U-4a	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
U-4b U-5	 a) The <u>intensity of use</u> is inconsistent with single family residential zones. b) <u>Traffic</u> the ADT for a single family is 10 ADT, Hillel in its current form generates 200 ADT. If built and successful the ADT will certainly be much higher. c) Noise: 		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
U-6	Noise Ordinance allows Single Family Residential: 50 dB(A) 7 AM to 7 PM 45 dB(A) 7 PM to 10 PM 40 dB(A) 10 PM to 7 AM Places of worship are allowed exterior noise of: Higher educational institutions are allowed: 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		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.
U-7	Family Housing. d) Visual / Community Character Impacts. Houses of worship in this area are set well back from the street and are actually difficult to observe from the street. This building will have minimum set back and almost no landscape screening. This building would be two levels in a single level area, and any times the length of any single family home, it would be out of bulk and scale with the neighborhood.		
U-8	This DEIR fails to consider the cumulative impact of setting a precedent to allow other student centers into a single family neighborhood. This effect is well known around the country where zoning has not been enforced around universities.		The project consists of three individual structures around a central outdoor courtyard providing 6,479 square feet of gross floor area. As
U-9	6. This DEIR fails to consider the impact of near-by construction and construction planned for the near future. The Venter Institute is being constructed off Torrey Pines Rd and their traffic impact has not been studied. There are as many as three other institutions planned for the same general area and they are not considered.		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. U-4b 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
U-10	7. There is a reasonable number of alternate sites in the area which would allow the student center to be legally situated and operated legally. Alternate sites can be found on both developed and undeveloped land. The Newman Center on Eastgate Mall and Genesee a good example. Hillel's goal of being within walking distance of dorms on the UCSD Campus makes no sense because the dorms are spread around a Campus that measures about 2 ½ miles by about 1 ½ miles. Simply being on the Campus periphery does not give proximity.	U-4b	
U-11	8. The proposed provided 27 parking spaces will be inadequate for either a religious center (needing 48-90 spaces) or a student center. It is difficult to pin down a comparable parking requirement for this student center, but in this automobile culture 50 spaces is realistic. In addition to not meeting the parking requirement, the project will remove 8 on street spaces and the cul-de-sac vacation and red curb painting will		

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

U-4b (cont.)

U-5

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 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

U-5 (cont.)

U-6

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.

U-7 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 U-8 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 offcampus 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. U-9 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.

U-9 (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.

U-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.

U-10 (cont.)

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.

U-11 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

U-11 (cont.)

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.

V-1

Letter V

From: Andrea Dahlberg <acdahlberg@yahoo.com>

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

To: DSD EA

Subject: UCSD Hillel Center for Jewish Life Project No.212995 / SCH No. 2010101030

The draft Environmental Impact Report (dEIR) for the UCSD Hillel Center for Jewish Life (212995) 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 it's attendees will take the bus or walk. However, as we see from students attending the university, patrons attending LJ 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/cul-de-sacs that do not have the 2-hour restriction.
- V-3 The dEIR does not adequately address the increased traffic the 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 8606 Cliffridge Ave La Jolla, CA 92037 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.

This comment does not raise any substantive issues related to the adequacy or accuracy or the EIR. No further response is required.

V-2

V-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. V-4 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).

From: Gail Forbes <tufmarna@gmeil.com> Sent: Sunday, March 10, 2013 11.43 PM To: DSD EAS Ce: Maria S Robteschild; Many Coakley Subject: UCSD Hillel Center for Jewish Life, Project, #212995 SCH No 2010101030 Response to the Draft Environmental Impact Report for the UCSD Hillel Center for Jewish Life Project #212995, SCH No 2010101030 From: Gail Forbes, .P.O. Box 717, La Jolla CA 92038 March 9, 2013 Comments On: S.O Executive Summary - The extensive use of Acronyms as a shorthand for the titles of various Regulations and Agencies (NCCP_BMP_MHPA, CHG_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 reflect. Little guidance is provided for the interested citizen, whether to attempt to respond to every mention of an issue, if he or she disagrees with the method, fact, or conclusion), or only the first instance of error or disputed conclusion. Also, the pagination of the report, and its length, makes copying portions for study and reflection very difficult. Summary - S.J. 1 Location & Setting The confusion created by the similarity of street names: La Jolla Scenic Way, and La Jolla Scenic Drive North, its abrupt end as a partial cul de sac, the usurpation of the traffic load by La Jolla Scenic Drive North, its abrupt end as a partial cul de sac, the usurpation of the traffic load by La Jolla Scenic Drive North, its abrupt end as a partial cul de sac, the usurpation of the traffic load by La Jolla Scenic Drive North, its abrupt end as a partial cul de sac, the usurpation of the traffic load by La Jolla Scenic Drive North, its abrupt end as a partial cul de sac, the usurpation of the traffic load by La Jolla Sce</tufmarna@gmeil.com>	W-1 W-2 W-3	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. 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. The names of roadways within the project vicinity are fully spelled out consistently through the EIR and are correctly used. 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."
The circumstances of the sale are not described. Prior to the unexpected and exclusive sale of the 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 Pueblo 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 solid parcel, is fisch 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 those 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 dismay and		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.
		There is no such requirement and the commenter does not provide evidence of such requirement. The project site is owned by Hillel.
	From: Gail Forbes atulmara@gmail.com> Sent: Sunday, March 10, 2013 11.43 PM To: DSDEAS Ce: Maria Stothschild; Mary Coakley Subject: UCSD Hillel Center for Jewish Life Project #212995 SCH No 2010101030 Response to the Draft Environmental Impact Report for the UCSD Hillel Center for Jewish Life Project #212995, SCH No 2010101030 From: Gail Forbes. P.O. Box 717, La Jolla CA 92038 March 9, 2013 Comments On: S.O. Executive Summary- The extensive use of Acronyms as a shorthand for the titles of various Regulations and Agencies (NCCP_BMP_MHPA_CHIG.ADT) is overwhelming to a non-expert. Although convenient for the writer rit is confusing for interested citizens reading this lengthy document. Every once in a while the full tile 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 citizen, whether to attempt to respond to every mention of an issue, rif he or she disagrees with the method, fact, or conclusion), or only the first instance of error or disputed conclusion. Also, the pagination of the report, and its length, makes copying portions for study and reflection very difficult. Summary- S. 1. 1 Location & Setting The confusion created by the similarity of street names: La Jolla Seenic Way, and La Jolla Seenic Drive South which lies a mile away, but is often referred to as La Jolla Seenic. The sharp deviation of La Jolla Seenic Drive South which lies a mile away but is often referred to as La Jolla Seenic. The sharp deviation of La Jolla Seenic Drive South which lies a mile away but is often referred to as La Jolla Seenic. The sharp deviation of La Jolla Seenic Drive South which lies a mile away but is often referred to as La Jolla Seenic. The sharp deviation of La Jolla Seenic Way, leads to the mis-identification of one , for the other.	From: Gail Forbes *tulmarn@granic.com* Sent: Sunday, March 10, 2013 11-43 PM To: DSD EAS Ce: Main's Rothschild; Many Coakley Subject: UCSD Hilled Center for Jewish Life, Project #212995 5CH No 2010101030 W-2 Response to the Draft Environmental Impact Report for the UCSD Hilled Center for Jewish Life Project #212995, SCH No 2010101030 From: Gail Forbes, P.O. Box 717, La Jolla CA 92038 March 9, 2013 Comments On: S.O. Executive Summary - The extensive use of Acronyms as a shorthand for the filles of various Regulations and Agencies (NCCP_BMP_MIPPA_CHIG.ADT) is over-whelming to a non-expert. Although convenient for the writer, it is confusing for interested cificzen reading this lengthy document. Every once in a while the full tilt eshould 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 cifizen may wish to refute. Little guidance is provided for the interested citizen, whether to attempt to respond to every mention of an issue, of the or she disagrees with the method, lact, or conclusion), or only the first instance of error or disputed conclusion. Also, the pagination of the report, and its length, makes copying portions for study and reflection very difficult. Summary S.1.1 Location & Sctring The conflision 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 of La Jolla Scenic Drive North should be more fully described. Road names are further complicated by the name of 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 South which lies a mile away but is often referred to as La Jolla Scenic Way, and La Jolla Scenic Drive South which lies a mile away but is often referred to as La Jolla Scenic Way,

W-5	See response to comment W-4.
	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.
W-6	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).

	sense of violation. It also motivated citizens, whose trust in the enforcement of the law had been broken, to step	W-7	The No Project Alternative was adequately analyzed in compliance
	forward and take legal action to correct the violation.		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
W-7	S.5.1 No Project Alternative- 6.0 Growth Inducement 7.0 Cumulative Impacts		regarding the use of the vacant site as open space.
	A complicated analysis could be done to weigh the benefits of buying back the parcel. As the time line of this		regulating the doc of the radam one as open space.
	project has lengthened, environmental mitigation has become an economic burden for many other developments in San Diego. Land that lends itself to restoration is hard to procure but needed to		The parcel could not be used for mitigation or habitat credits as it is
	implement conservation plans under agreements with other agencies. This parcel lends itself to restoration and linkage as few other urban parcels do.		an entirely urbanized area, with no connectivity to established wildlife
14/ 0	· ·		corridors.
W-8	4.2 Environmental Analysis -Traffic & Circulation also 7.0 Cumulative impacts Lands to the West of the project are described as vacant. These University of California, San Diego (UCSD)		
	properties, along Torrey Pines Road, are no longer vacant, but are in the midst of a major project. That project will result in a 45,000 sq ft.complex of scientific research buildings. This project and the UCSD development	W-8	Baseline physical conditions, or environmental setting, are detailed
	continue a process of destruction of open space, and deterioration of habitat near parcels of Multiple Habitat		as they existed when the NOP was issued (2010); there was no ongoing construction at this location at that time. Nonetheless, the
W-9	Planning Areas. Traffic, Circulation and Transportation Studies do not consider this change which will alter traffic studies and		recirculated EIR (December 2013) was revised to indicate that
W-10	increase average daily trips and carrying counts		property west of the project site, across Torrey Pines Road, is
. ** 10	Continuity with any future bike ways along Torrey Pines ,La Jolla Village Drive, or La Jolla Scenic should be mentioned in the report.		planned and permitted for institutional uses (owned by UCSD).
W-11	4.3 Biological Report also 4.3.1 Existing Conditions		
	The date of the sale of the Open Space Parcel, in 2000 is important, as it precedes the completion of some		The proposed project does not contain natural habitat, is not located
	aspects of the Multiple Species Conservation Plan- most notably the Final Designation of San Diego Fairy Shrimp Habitat (2007) of the Multiple Species Conservation Plan (MSCP) 2003. The draft report does not		within the MHPA, and is isolated from MHPA lands. The project's
	indicate any use of the U.S. Fish and Wildlife Information, Planning and Conservation System (IPACS), available to developers, since 2007, to assist them in resource conservation.		potential to impact biological resources is fully addressed in EIR Section 4.3, and concludes that impacts to biological resources
10/ 40	• • • •		would be less than significant.
W-12	4.3.1.4; Sensitive Species; also 4.3.3.2; Significance of Impacts; also 4.3.3.3 Mitigation; also 4.12.6.1 Lighting Impacts		would be loss than significant.
	The report does not include reference to the Cornell Ornithology E-Bird website. That website has become a useful and reliable tool for tracking bird species, and migration in an up to date way. Additional birds observed	W-9	The Venter Institute project was added to the cumulative projects
	on the parcel, or utilizing the parcel include: Cooper's Hawk, Kestrel, Red Tail Hawk and at night, Barn Owl.		within the recirculated EIR (December 2013). Please see EIR
	Mitigation for the removal of the open space foraging could include: 1) the specific naming of plants known to attract birds, to provide perches and food for raptors and songbirds		Section 4.2.3.1(a) and Chapter 7 for analysis that includes this
W-13	2). The inclusion of a small water feature available to birds, designed to be conservative in use of of water and energy, would also act as mitigation for loss of their access to open space. (See San Diego Audubon monthly		project.
W-14	magazine "Sketches" January, 2013 volume 64 Number 5 "Creating an Avian Oasis").		Access to and from the Venter Institute is discussed in Section
VV-14	3) No mention is made of window or building designs that help to prevent bird and window collisions. There are techniques available that mitigate this source of bird death. See also Lighting Impacts 4.12.6.1 mention of		4.2.3.1(a) of the EIR. As stated therein, the Venter Institute has
	extensive use of glazing		revised the site plan to only provide access from Expedition Way (full
W-15	S.5.4 Environmentally Superior Alternative; also 4.3.1.4 Sensitive Species; also 4.3.1.5.b Multiple Species		access driveway). Access from Torrey Pines Road would be
	Conservation Program ;also 4.3.3.3. Mitigation;also 4.3.4 Sensitive Habitats;also 4.4 Geology According to Multiple Habitat Planning Area (MHPA), Figure 3, the Hillel parcel is near two portions of the		eliminated. The cumulative analysis in this report assumes the trip
	City of San Diego Multiple Habitat Planning Area. The proposed location for the Hillel Center is about 3200		assignment associated with the full access on Expedition Way. This
1 10/ 40	feet from the Southern mapped section, near Gilman, and about 2200 feet from the Northern section, of the these large protected segments. The Figure 3 does not identify the segments by name or number.		project has been constructed. Thus, traffic generated by this
W-16	Those familiar with the area will know that on the southerly MHPA segment, the City of San Diego ,Pottery Canyon Park leads uphill to La Jolla Scenic Drive North, across that road and down into the westerly portion of		cumulative project was included in the near-term condition.
	the natural park, ending at a heavily wooded section of the Torrey Pines right of way. The median of La Jolla		The cumulative traffic analysis (see Section 4.2.3.2[a], specifically
	2		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.

W-10 As detailed in EIR Section 4.2.1.2(a):
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.
The project would not conflict with existing bicycle facilities, is would it interfere with any potential future bike facilities. The project would enhance the pedestrian and bicycle facilities adjacent to project site. For example, as detailed in Chapter 3:
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.
W-11 The project site is not an "open space parcel." The project is require to be analyzed against the baseline conditions when the NOP wissued, which was in 2010. The Biological Technical Report with prepared in accordance with the City's Biology Guidelines (2000). The biology report and EIR adequately details the relevant regulated framework related to biological resources, including the MSCP.
W-12 The project's Biological Technical Report was prepared follow City guidelines and requirements for surveys and evaluation aviary wildlife. As disclosed in EIR Section 4.3.1.4, Cooper's hawk sensitive raptor species recognized by CDFW, and migratory a breeding birds have potential to nest on and adjacent to the projecte. EIR Section 4.3.3.2 goes on to state that the existing eucalypt

12 (cont.)	
trees on-site have the species of special activities associated raptors including Coland indirect construction. Therefore, mitigation	ne potential to support Cooper's hawk, a CDFW concern. Because clearing and construction with Phase 1/Phase 2 could be disruptive to oper's hawk and breeding or nesting birds, direct ruction project impacts would be significant. In in the form of pre-construction surveys, as 4.3.3.3, would reduce impacts to a less than
and/or any native/r Mitigation is not req site, Disturbed (Tier	mitigation required for the protection of raptors nigratory birds during their breeding season. uired for the loss of the communities found on-IV habitat) and developed lands (no Tier), as red sensitive. Thus, impacts would be less than
Window glazing ass LEED designation making the windows 3-13 show the archi obscured by overha	be required to comply with glare regulations. ociated with the project would contribute to the sought by the project, but does not refer to more reflective. Furthermore, Figures 3-12 and tectural design of the project. Most windows are ng, landscaping, or screening walls. Therefore, duce the likelihood of bird and window collisions.
project site. These numbers to refer to.	that there is MHPA land in the vicinity of the MHPA lands do not have identifying name or The proposed project is not located within nor A, and is isolated from MHPA lands.
	site does not, nor does it have the potential to, e wildlife corridor due to the highly urbanized
As detailed in Section	n 4.2.1.5(c):'
and maintain a animals and pla levels. The MS0 habitat having t	ary objectives of the MSCP is to identify a preserve system which allows for nots to exist at both the local and regional CP has identified large blocks of native ne ability to support a diversity of plant known as "core biological resource"

Scenic Drive North is wooded and naturalized along the length of the street, heading North, until just before the project parcel. Additionally, the undeveloped verge of Gilman Drive to the East, provides a similar corridor for birds and animals to move through the area ,and between the Habitat segments with some protection. Portions of the land along the Gilman roadway have been preserved in natural and/or landscaped open space pursuant to an easement granted(or to be granted) to the City of San Diego in Tract H of the La Jolla Shores Planned District

These lengthy, but narrow naturalized pathways provide a feasible linkage towards the Hillel parcel. When

the acreage of the proposed street vacation is added to the project parcel ,an improved wildlife corridor is possible. The State of California's Torrey Pines Preserve is about a half mile away from the proposed development and it would also benefit from the establishment of these linkages. Ecologists recognize that islands of preserved habitat need to be connected with each other for diversity, and for hedging bets against catastrophic wildfire, drought or disease that would threaten survival of species in isolated habitat areas. Located between two major parcels of preserved habitat, the Hillel parcel in conjunction with nearby naturalized pathways, could significantly contribute as a connector between North and South Multiple Habitat Planning Areas. Consideration should be given as to the value of buying back the parcel -the no project alternative. In so doing , the City of San Diego could utilize the parcel to implement the Multiple Species Conservation Plan. This buy back plan with restoration could alleviate some of the delay in finding areas to establish a Habitat Conservation Plan, a benefit similar to those being discovered in cap and trade negotiations. The Environmentally Superior Alternative (and expensive alternative) is to buy back a parcel that should never have been sold.

4.3.1.5.b Multiple Species Conservation Areas also 4.3.1.5 also 4.4.1.2 Ground water; also S.5.4 Environmentally Superior Alternative

W-17

W-18

W-19

The Hillel project parcel was sold prior to the Final Rule establishing San Diego Fairy Shrimp ,published in the Federal Register by the US Fish and Wildlife in December of 2007. The groundwater report states" Perched or ponded water may develop upon the well-cemented Lindavista Formation. It is unclear from the report whether this parcel, as Open Space, was ever evaluated for the historic evidence of vernal pools ,although paleontological research was performed . Since the sale preceded the establishment of a rule.."We have not evaluated new occurrences discovered after the 2003 proposed rule to determine whether they are essential to the conservation of the species." (Federal Register page 70654,vol 72, No. 78, Dec 12,2007; Report of Rules and Regulations). there may be no need to research because the issue is moot. However, the intent is to preserve the shrimp when possible. Survival of the San Diego Fairy Shrimp requires proactive measures, and on-going management, such as re-establishing vernal pools. Consideration of the dollar value of establishing a survival niche for the Fairy Shrimp on the parcel to mitigate other development in City of San Diego may lend weight to the No development Alternative.

The dormant cysts of the San Diego Fairy Shrimp are capable of surviving prolonged drought, as they are banked in the soil at vernal pools. There is a reasonable expectation that the San Diego Fairy Shrimp may have occupied the parcel historically. The report does not mention any on site survey; no one actually looking for this small crustacean. It does state that no vernal pools were on the property but offers no data. In fact groundwater pooling is mentioned in 4.4.1.2 Groundwater "Perched or ponded water may develop upon the well-cemented Linda vVsta

Formation." Since Fairy Shrimp can reach maturity, under the right conditions, in less than two weeks, it is possible that they were overlooked while surviving in the dormant stage, between biological surveys, and that any pooled water was no longer extant when on-site surveys were performed.

4.3.1.5 Regulatory Framework also 4.3.1.5 b also 4.4 Geology and Soils also 4.4.1.2 Groundwater The RECON letter, appendix C to the biological report, mentions that wildlife surveys were performed in low water,low seasonal rainfall dates. See Table 1 "Survey Dates, Times and Weather Conditions" in the letter from RECON to R. Lapidus Appendix. # C." Limitations to the compilation of a comprehensive floral checklist were imposed by seasonal factors, such as blooming period, emergence of some annual species, and low seasonal rainfall. The wildlife surveys were limited by seasonal and temporal factors".

W-17 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 or the EIR. No additional response is required.

W-18 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 mima 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.

W-19 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.

2

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)."

W-20 4.5. Energy Use & Conservation (Electricity, Solid Waste, 4.6 Greenhouse gas)
In section 4.5.3.1 reference to Educational institutions or education The project is applying for a permit under

In section 4.5.3.1 reference to Educational institutions or education The project is applying for a permit unde a religious use. This contributes to the image that the development is really a Student Center or an office building and not a Center for Jewish Life.

W-21 4.8.3.1 Ambient Noise 6.0 Growth Inducement Deviation also 6.3 Precedent Setting

, "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"

This quotation from the report can be contradicted by police reports and neighborhood code complaints from the San Diego State neighborhoods who have the misfortune to live near mini-dorms or the fraternity and sorority houses. College Students make noise, especially at social gatherings. Granting a permit to build a gathering space for college students in a single family zone sets a precedence and subverts the intent of the Mini-dorm Ordinance established after experiences of residents near San Diego State and other college campuses.

- W-22 The deviation in Maximum paving on the Cliffridge lot to permit extra parking spaces is contrary to the intent of the Mini-dorm ordinance which prohibits such paving as a way to control the use of a building to prevent domittory living.
- W-23 6.1 Population Growth

Error the word "not" is left out of line. "Furthermore, the HCJL does.... contain any elements that would stimulate economic growth or the need for additional housing."

W-24 6.2 Indirect Growth Inducement

This description is difficult to analyze as written. Any development induces growth. From the way it is written it is difficult to understand if population growth, highway growth or housing growth is considered detrimental ,or beneficial under California Environmental Quality Act guidelines.

Thank you for consideration of these comments, Gail Forbes 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 use 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 patios, which 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.

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-22 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-23 The Final EIR has been revised to include the word "not."

	W-24 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.
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Letter X

 From:
 Ted Frankel <ted@math.ucsd.edu>

 Sent:
 Tuesday, March 05, 2013 8:03 PM

To: Kim R
Cc: DSD EAS

Subject: Re Some things to consider when responding to dEIR

To Environmental Planners

X-1 With respect to the proposed Hillel Center for Jewish Life (Project #212995), the prospect of having a student center built in our small compact residential neighborhood is very distressing. Everything that would take place with such a project is antagonistic to the peace and tranquirity of our little family residential neighborhood. The prospective commotion, the food deliveries, the parking, the lights, the traffic, the noise, narrowing the already small street are all anothering to us.

The feelings of the neighborhood have been made boldly clear repeatedly to the people who want to build their student center in our neighborhood. We neighbors have spent years of effort and considerable money in an effort to protect our living space from this proposed invasion. The would-be invaders appearently do not dare a bit for the wishes of the people who live here; these would-be invaders seem obstinately determined, with a buil-hisaded tack of consideration for the concerns of us residents. They remain deaf to our pleas. Apparently they want only to invade and build and congregate here, no matter how selfish they are being or how much brutal force they must employ to do it.

Please help us

Jonnie and Ted Frankel 8827 Robinhood Lane La Jolla, Ca 92037 X-1

The initial portion of this comment represents the commenters 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.

Letter Y

From: Otila Gallegos <gallegos6343@roadrunner.com>

Sent: Monday, March 04, 2013 1:34 PM

To: DSD EAS

Subject: Fwd: UCSD Hillel Center for Jewish Life, Proj #212995/SCH No. 2010101030

Resending since this was inadvertently sent to an incorrect email.

Begin forwarded message:

From: Otila Gallegos < gallegos 6343@roadrunner.com >

Date: March 4, 2013 10:12:23 AM PST

To: DSDEA@sandiego.gov

Bcc: Kim R <kimpotmail@yahoo.com>

Subject: UCSD Hillel Center for Jewish Life, Proj #212995/SCH No. 2010101030

Atten: E. Shearer-Nguyen, Environmental Planner

We are residents of the neighborhood which the proposed subject project would impact. We have lived in our home on Cliffridge Avenue for nearly 30 years with the idea that the neighborhood would maintain its single family orientation, enviable by many. As members of this community we are most concerned about being at risk of losing the integrity of our neighborhood with the proposed UCSD Hillel Center for Jewish Life. Our opposition is not influenced by religious affiliation. As Catholics, we would also be opposed to the establishment of a Newman Center. We are of the strong opinion that this should be a UCSD project, located on UCSD property, as are other religious centers.

Y-2 Already, we are impacted by other UCSD affiliated projects, namely the J. Craig Venter Institute on La Jolla Village Drive/Torrey Pines Road. It is understood that this is being built on UCSD property, however it does not appear to be taken into consideration in the planning of the Hillel Center. There is no mention of how the Hillel project will impact out neighborhood even more given the access to and from 4 planned Venter Institute buildings. This needs to be addressed.

In conclusion, we are adamantly opposed to the UCSD Hillel Center for Jewish Life at the proposed site in our neighborhood.

Tila Gallegos Nik Sorenseene Y-1 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.

Y-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.

Letter Z RECEIVED MAR 1 1 2013 Patricia Granger 8854 Robin Hood lane Development Services La Jolla, CA 92037 858 4450-9441 patgranger@aol.com E. Shearer-Nguyen, Environmental Planner City of San Diego, Development Service Center 1222 First Avenue MS 501 San Diego CA 92101 DSDEAS@sandiego.gov Subject: UCSD Hillel Center for Jewish Life, Project No. 212995 Date: March 8, 2013 Dear Ms. Shearer-Nguyen. Lam 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	P. 2 Subject: UCSD Hillel Center for Jewish Life, Project No. 212995 Traffic and Transportation: Flawed Traffic Study The traffic study taken for the Hillel project failed to take into account the traffic from the Venter Institute. Many planners forget that UCSD's expansion comes under the University Planning Association but fail to recognize that much of expansion the on campus hugely affects the La Jolla area as with the Venter Institute. Venter Parking: 112 parking spaces Maximum occupation 125. To open October 2013. Future impacts: Three other buildings are planned for the same site. The entrance and exit is to be from Torrey Pines Road South. A raised traffic median will be built to prevent exiting traffic crossing Torrey Pines Road. Traffic that wish to travel north on Torrey Pines Road will have to drive south on Torrey Pines Road to the profile links of Clark.	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
Z-1b	Road to the traffic lights at Glenbrook and Dunaway, make a U-turn and then travel north on Torrey Pines Road to the traffic lights at Torrey Pines Road and La Jolla Village Drive. OR As many cars already do is to make a short cut through the neighborhood by taking a left turn on to Glenbrook and a left turn on Cliffridge Avenue and a right turn to La Jolla Scenic Drive and left onto La Jolla Scenic Way to join La Jolla Village Drive. This second way avoids the often-		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-2	long wait for the traffic lights at Torrey Pines Road and La Jolla Village Drive. Take into consideration traffic impacts of cars parking in the neighborhood from the soccer players at Allen field. Traffic impacts from the La Jolla Theater district on UCSD campus. Cars park at the north end of Cliffridge Avenue and La Jolla Scenic Way for the theater at weekends.	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
Z-3	The traffic study should take into consideration Hillel's students will take advantage of parking in the neighborhood for longer than 2 hours: students will be able to park from 4pm on Friday evening until Monday morning at 10am. Students will be able to park all day Saturday and Sunday		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.
Z-4	The traffic study should also take into consideration that this is a FAMILY NEIGHBORHOOD. Hillel's busiest time will be Friday evening and all day Saturday, just the same time that neighborhood children are about on bicycles and skateboards. This is family time. The neighborhood is under huge traffic stress and narrowing an already busy street makes the neighborhood that much more dangerous. Please comment on all of the above. Thank you, Patricia Granger		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.

Z-3 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

Z-3 (cont.)

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, 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.

Z-4 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).

P. 3

UCSD Hillel Center For Jewish Life Project No. 212995

No Curb Cuts or Driveways on La Jolla Scenic Way.

Z-5 The new plans for a Hillel student Center on Site 653 still show the entrance and exit to be from La Jolla Scenic Way, this violates thirty six years of City planning that specifically denies access from La Jolla Scenic Way or La Jolla Village Drive. (See enclosed documents from 1997)

If La Jolla Scenic Way and La Jolla Village Drive were considered dangerous for access to Site 653 in 1977, how much more dangerous is it now 2013?

Please explain why, with supporting documentation the City of San Diego Development Services Department in concert with Traffic and Transportation has been authorized to allow the applicant Hillel not only to ignore the prior rules regarding this stretch of road, but to place the entrances to a car park on this same of formerly "unpermitted" access. If you read the record, you will note that prior requests to "cut the curb" were denied by City staff – yet now this applicant is once more being fully supported, with staff recommendation for approval, despite its being denied by every single La Jolla community-planning group, and denied by the Planning Commission since 1999. We have asked this question many times at public hearings but after thirteen years the community deserve an accurate answerer.

Patricia Granger

See attached documenti P. G.

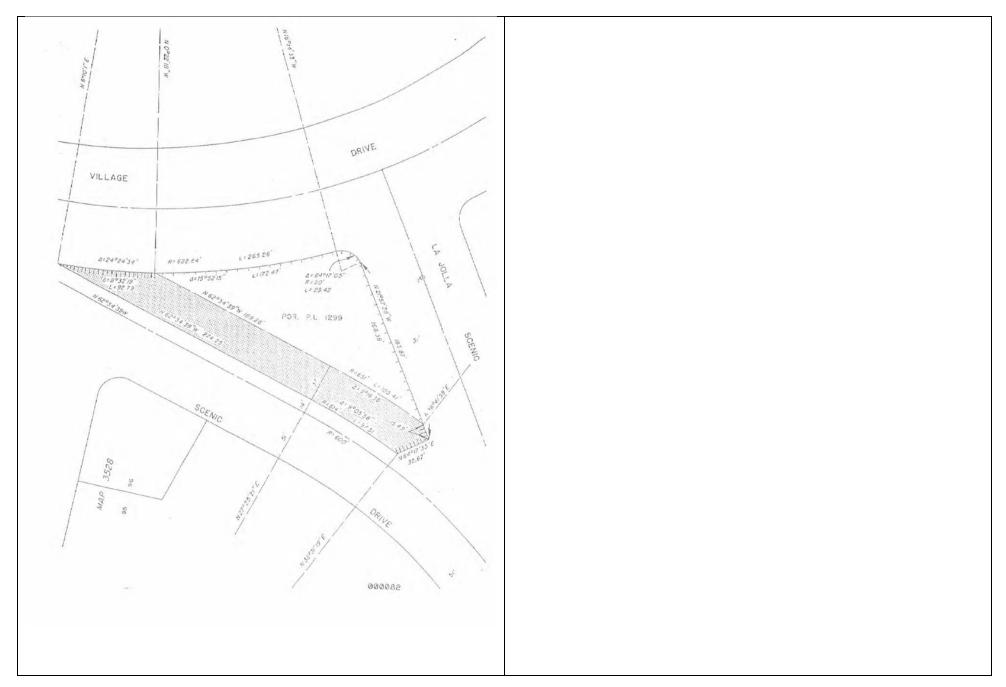
Z-4 (cont.)

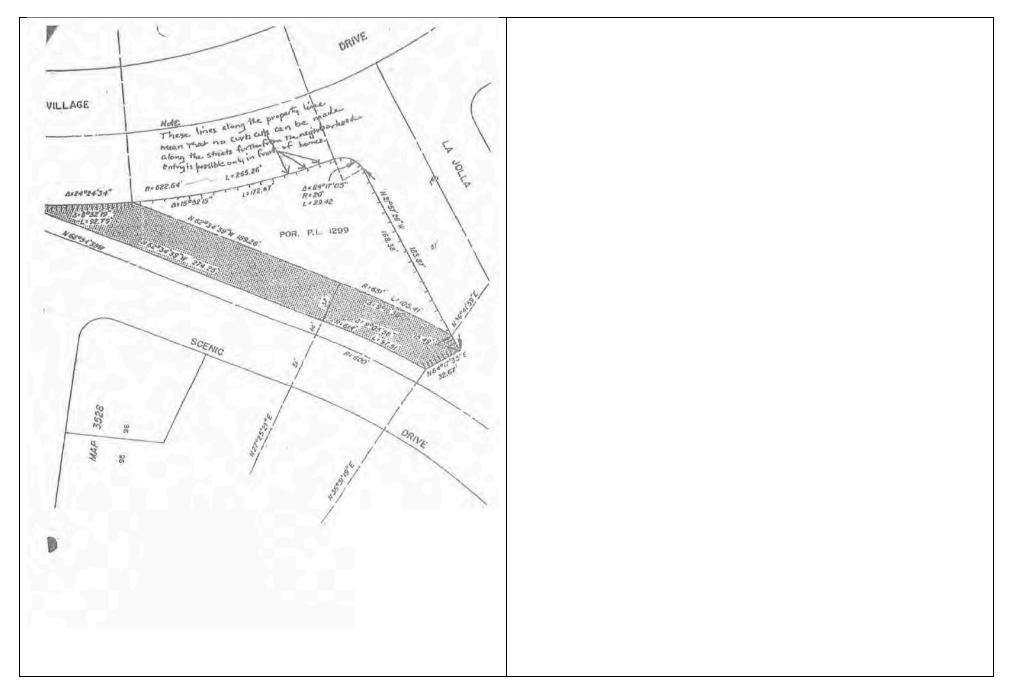
La Jolla Scenic Drive North along the project frontage is currently 36 feet from curb to curb. Thus, the reduction of the roadway width from 36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.

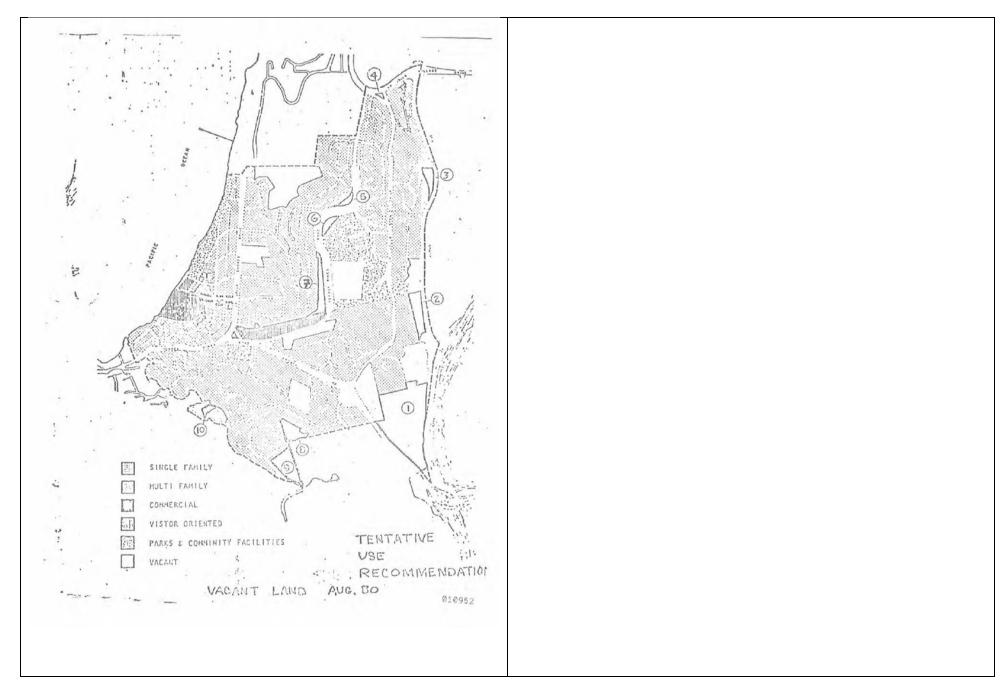
Z-5 A project driveway is proposed on La Jolla Scenic Way approximately 150 feet south of the La Jolla Village Drive/La Jolla Scenic Way intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix B) of the DEIR. The proposed driveway 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 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.

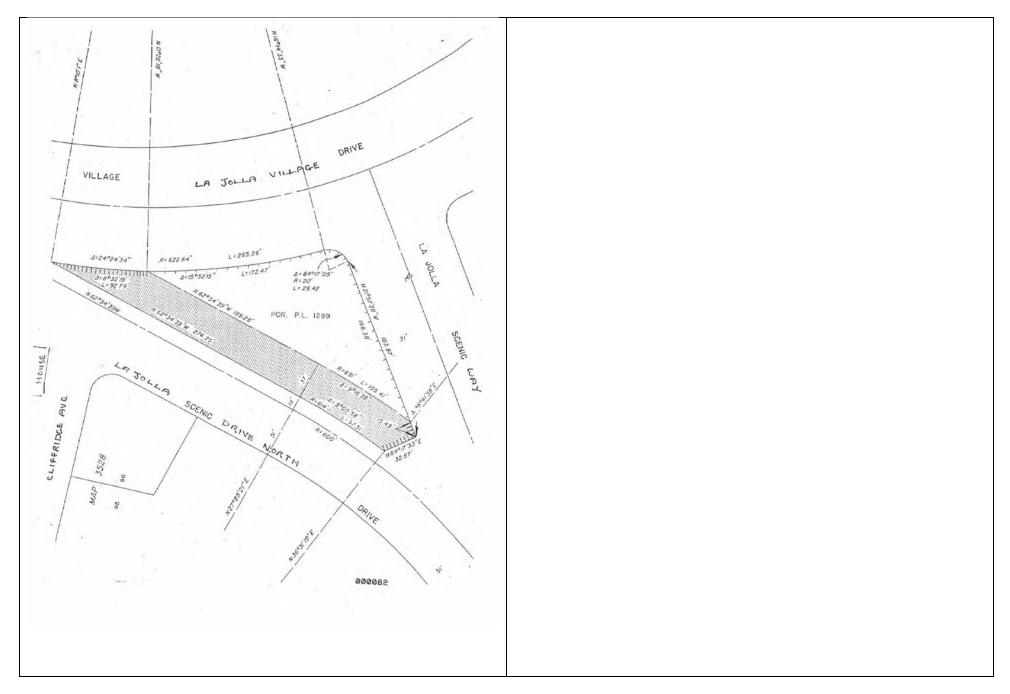
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	Division Superi	ntendent			
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October 1, 1980

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MARK STEELE
R. M. TOMB
NANCY WARD

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.

Insofar as the remaining vacent 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 FRD.

Rere 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: 51.66 Acres, no change from existing La Jolla Shores Precise Plan. Traffic flow and topograph 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.

010954

POST OFFICE BOX 1633 - LA JOLLA, CALIFORNIA 82036

October 1, 1980 City Council of San Diego Page Two

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

Property 64: .32 Acres, this property to become landscaped open space: Traffic and location were the prime factors in the property.

Property 85: 1.84 Acres, no change from existing zone (1 unit per 20,000 square feet?). Topography was the prime consideration.

Property 86: 2.85 Acres, no change from existing zone (1 unit per 20,000 square feet?). Topography was the prime consideration.

Property 07: 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 50 units.

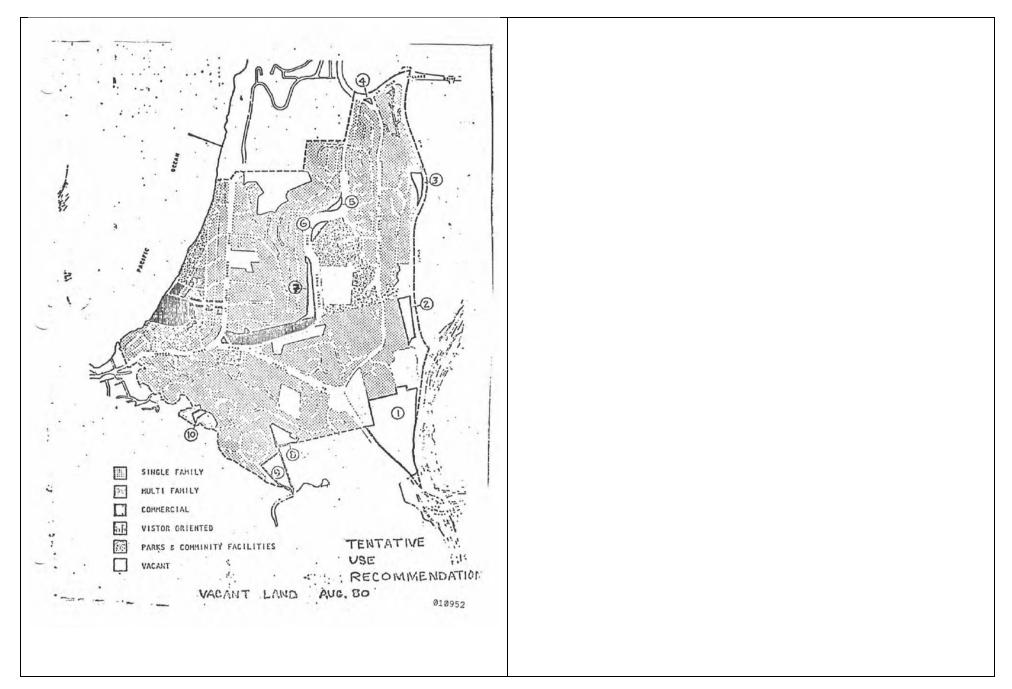
Topography and contiguous land use were primary factors.

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.

Mark W. Steele

Chairman of the La Jolla Shores Association Planning Committee

010953



P. 4

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

The Removal Public Right of Way. Street Vacation.

2 feet width of La Jolla Scenic Drive and removal of Cull de Sac

Ms. Shearer-Nguyen.

Z-6

My first concern is the Right of Way Vacation on La Jolla Scenic Way. To give public land to a private entity for its private use when that land consists of part of a public highway and a cull de sac that is in use 365 days a year is in violation of the La Jolla Shores Planned District Ordinance.

Cannot meet the findings.

The narrowing of a busy street puts people at risk. Please explain how removing 2 feet wide, strip of roadway for the length of Site 653 benefits the community?

Please also explain how removing the cull de sac which is used for pedestrians and cyclists going to the traffic lights at the junction of Torrey Pines Road and La Jolla Village Drive. The cull de sac is used as a turnaround for cars, which have lost their way. If the cull de sac is removed, cars with try turning around in the intersection of La Jolla Scenic Drive and Cliffridge Avenue causing a dangerous situation.

The Cull de sac has also been used for parking City equipment and the police have used this area while observing traffic. Please explain how removal of the cull de sac can benefit the community.

Patricia Granger

Please see Marle John john le

Z-6

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.



P. 5

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

Ms. Shearer-Nguyen,

Student Center to Religious Center

Z-7 Since 2000 and up to and including the Scoping meeting on Wednesday October 27, 2010, Hillel's project has had' Hillel Student Center' in the title of the project.

Hillel of San Diego Student Center of UCSD was on the Public Notice of October 1st 2008 Planning Commission Recommendation Notice Project number 149437.

The long-term project has had many Project Numbers and slight variations in the name but **Hillel and Student Center**, has been in the title of the project.

Changing the name of the project from Hillel Student Center to 'UCSD Hillel Center for Jewish Life' has been a change of convenience to get around the La Jolla Planned District Ordinance, which doesn't allow for student centers in a single-family neighborhood.

Patricia Ganger

Z-7 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.



THE CITY OF SAN DIEGO

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 lewish 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



Planning and Development Review 1222 First Avenue, MS 501 * San Diago, CA 92101-4155

Page 2 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 Didion Program Manager

RWD/gwg

Mike Uberuaga, City Manager

Tina Christiansen, Director, Development Review Stephen Haase, Assistant Director, Development Review Shariar Afshar, Property Agent, Real Estate Assets Ed Plank, Council Liaison

Alison Glennon, AIM Tracking System Coordinator

Gary Geiler, Associate Planner

AIM# 00-109



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 IO: 24000958

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 noticed 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, http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml.

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 7:30 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 7:30 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 <u>DSDEAS@sandiego.gov</u> referencing the Project Name (Hillel Student Center if San Diego) and Number (212995) in the subject line within 30 days of the receipt of this notice/date of the Public Notice above. 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/212995

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 8976 Cliffridge Avenue on an approximately 0.2-acre parcel (Assessor's Parcel No.

[APN] 344-13I-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 344-120-4300) 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 6,600 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 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

Applicant: Hillel of San Diego

Recommended Finding: Pursuant to Section 15060(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 (EIR Scoping Letter) in alternative format, call the Development Services Department at (619) 446-5460 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) 446-5446 or (800) 735-2929 (TEXT TELEPHONE).

Additional Information: For environmental review information, contact Elizabeth Shearer-Nguyen at (619) 446-5369. 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) 446-5231.

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://cierkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html) and distributed on October 8, 2010.

Cecilia Gallardo, AICP 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

Office of The City Attorney City of San Diego

MEMORANDUM

DATE: December 3, 2008

TO: Honorable Mayor and City Councilmenthers

FROM: Karen A. Heumann, Assistant City Attorney

SUBJECT: December 2, 2008 Council Docket Item-343,

Hillel of San Diego Student Center, Project No. 149437. An application for a Site Development Permit, Easement Acquisition, and Public Right-of-Way Vacation (portion of La Jolia Scenic Drive North between Torrey Pines Road and La Jolia 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 a Hillet of San Diego Student Center. The tem included four separate requests for action.

- Certify the Mitigated Negative Declaration No. 14943, Adopt Mitigation Monitoring and Reporting Program
- 2 Approve Site Development Permit No. 527861
- 3. Approve Easement Acquisition No. 584509, and
- 4. Approve Public Right-of-Way Vacation No. 527860

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

After the Council item had already been docketed and the docket was nosted 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 Vanation (No. 4 above).

After an independent review of the property posting requirements and whether those requirements had been met, this Office any sed the City Council that the property posting notice requirements would be satisfied by hearing the public right-of-way vacation on Douember 5. The other sub-items could be property continued to December 5, when all four components of the project could be heard at a special meeting of the Council. A motion for continuance was



THE CITY OF SAN DIEGO

DATE OF REVISED NOTICE: October 1, 2008

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 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 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 at 8976 Cliffridge 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 Cliffridge 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 (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.

PROJECT NUMBER: 149437

PROJECT NAME: HILLEL OF SAN DIEGO STUDENT CENTER

CONTACT NAME: ROBERT LAPIDUS

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. 43-0276



DATE OF HEARING:

October 16, 2008

TIME OF HEARING:

9:00 AM

LOCATION OF HEARING: Council Chambers, 12th Floor, City Administration Bulling,

202 C Street, San Diego, California

PROJECT NUMBER:

149437

ROJECT NAME:

HILLEL OF SAN DIEGO STUDENT CENTER

APPLICANT: Hillel of San Diego

COMMUNITY PLAN AREA: La Jolla

COUNCIL DISTRICT: District 1

TTY PROJECT MANAGER:

Daniel Stricker, Development Project Manager

'HONE NUMBER: (619) 446-5251

INDER THE PROVISIONS OF THE PUBLIC STREETS, HIGHWAYS AND SERVICE EASEMENTS 'ACATION LAW AND FIXING A TIME AND PLACE FOR HEARING THEREOF.

IOTICE IS HEREBY GIVEN that the Council of the City of San Diego, California, will proceed under the rovisions of the Public Streets, Highways and Service Easements Vacation Law to adopt a Resolution imminating the public right to use a certain street and/or public service easement as shown on drawing to 00116-C, located along the north side of La Jolla Scenic Drive North, between Cliffridge Avenue and La olla Scenic Way to be vacated.

or more information concerning this notice, contact the City Project Manager listed above.



DATE OF NOTICE: October 1, 2008

NOTICE OF PUBLIC HEARING PLANNING COMMISSION RECOMMENDATION

DATE OF HEARING: TIME OF HEARING:

October 16, 2008 9:00 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: PROJECT NAME:

HILLEL OF SAN DIEGO STUDENT CENTER

APPLICANT:

Hillel of San Diego

COUNCIL DISTRICT:

La Jolla

CITY PROJECT MANAGER:

COMMUNITY PLAN AREA:

District 1

PHONE NUMBER:

Daniel Stricker, 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 sites are located at 8976 Cliffridge Avenue (Phase I, a 8,879 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 (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

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

Ti don will be made available in alternative formats upon request. To request ar alter. __iormat or to request a sign language or oral interpreter for the meeting, call the Li. __,y Services Program Coordinator at (619) 236-5979 at least five working days prior to the meeting to insure availability. Assistive Listening Devices (ALD's) are available for the meeting upon request.

Joh Order No. 43-0276

Healtalablibatillallashidaddhaallbaabilt

HCEFFST 35055

La Jolla CA 92037 8854 Robinhood Ln Pat Granger



BEGINESTED HELDHN SEHNICE 1222 First Ave., MS 501 San Diego, California 92101-3864



		1	
17	P. 6		
19	UCSD Hillel Center For Jewish Life Project No. 212995		
8	Hillel Administrative Offices at 8976 Cliffridge Ave. 8976 Clifridge Ave. Code violation		
	Why does Hillel have an office in a single-family neighborhood when there is office space available in the office complex at La Jolla Village Professional Center, 8950 Villa La Jolla Drive? In the age of electronic communications an office need not be in the single-family neighborhood.	Z-8	This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.
1	Hillel's office at 8976 Cliffridge Avenue has been in violation of the La Jolla Shores Planned District Ordinance, which does not allow for offices in a single-family residential neighborhood. This office has been allowed to remain in violation since 2003.		
4	Please explain why Hillel has received preferential treatment even though the violation has been reported to code compliance annually?		
4	Patricia Granger		

_		
	P. 7	
	Project Name (UCSD Hillel Center for Jewish Life) and Number (212995)	
	Control of the contro	
	and the second s	
	Where is exactly Site 675. Please show on accurate Maps	
	Patricia Granger	

P. 8

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

Limiting the size and future expansion of the Hillel projects.

Z-9 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?

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

Patricia Granger

Z-9 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.

P. 9

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 of 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

Uncommon, Found in woods and edges of woods, often hunts around houses and birdfeeders. Nests in tall trees, especially pines. Solitary, Feeds on small birds and mammals captured in surprise attack. A medium-size accipiter.

America Kestrel p. 115

Uncommon in many open habitats from dessert grasslands to meadows to brushy fields; often seen on roadside wires or fenceposts, pumping 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.

RTC-180

Letter AA



Law Offices of Julie M. Hamilton

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.

2835 Camino del Rio S., Ste. 100 • San Diego, CA 92108 • Ph; 619.278.0701 • Fx: 619.278.0705 www.jmhamiltonlaw.com

Ocean View Estates Homeowners assn. Inc. v. Montecito Water Dist. (2004) 116 Cal.App.4th 396, 400; Sutter Sensible Planning, Inc. v. Board of Supervisors (1981) 122 Cal.App.3d 813, 820.

²² Cal. Pub. Resources Code §21092(b)(1); CEQA Guideliines §15087(c), Gentry v. City of Murrieta (1995) 36 Cal. App.4th 1359, 1385, fn.12.

CEQA Guidelines, §15045.

⁴ Ultramar, Inc. v. South Coast Air Quality Management Dist. (1993) 17 Cal. App. 4th 689, 700.

⁵ Cal. Pub. Resources Code §21091(b); CEQA Guidelines§ §15105(a), 15205(d).

Ms. Elizabeth Shearer-Nguyen March 11, 2013 Page 2

AA-1

The public notice failed to state the address where the DEIR and all documents referenced in the DEIR could be reviewed. The public notice states the DEIR and all documents referenced in the DEIR "may be reviewed or purchased at the Fifth floor of the Development Services Center." The public was required to return to the introductory paragraph of the notice to determine the Development Services Center was located at 1222 First Avenue, MS 501, San Diego, CA 92101. The notice does not state the DEIR was also available at the Downtown Library and the La Jolla Branch Library. This information is not available until Page 1-4 of the DEIR. The public could not know about the availability of the DEIR for review without a copy of the DEIR.

On January 29, 2013, Kimberly Rebeiz contacted the Development Services Department inquiring as to the availability of the DEIR for review. A member of the staff informed Ms. Rebeiz she could review the DEIR online, or pay for a hard copy. The staff member did not know the cost of a copy of the DEIR. The staff member also told Ms. Rebeiz the DEIR was not available at the La Jolla Library. The notice failed to provide the information necessary to allow the public to review the DEIR and all supporting documentation in a timely manner. This failure to provide adequate notice of the DEIR requires the document be re-noticed for public review, and the review period extended another 45 days with proper notice to the public.

Executive Summary

AA-2

The Executive Summary fails to provide an accurate and stable project description. The Fourth District Court of Appeal set aside the vacation of Right of Way previously approved by the City of San Diego. The Executive Summary and all other sections of the DEIR should describe the size of the project site prior to the vacation of right-of-way and include the size of the project site after the proposed vacation of right-of-way. Throughout the document the Cliffridge Property is described as .2 acres and Site 653 is described as .8 acres with no information as to whether these numbers include the land to be gained by Hillel through the right-of-way vacation.

AA-3

The project description fails to state the proposed project is a student center, rather the project description misleads the reader by discussing religious uses but failing to state the project is meant to serve the students of UCSD. The project description fails to describe the size of the existing residence at 8976 Cliffridge Avenue, The project description describes the use of 8976 Cliffridge Avenue as "administrative offices, one-on-one counseling, and meetings with students." (p. S-3.) On the next page, the DEIR describes the use of the Cliffridge property to "provide for religious programs." (p. S-4.)

AA-4

The Executive Summary fails to identify significant impacts to Land Use, Transportation/Circulation/Parking and Visual Effects and Community Character, Subsequently, the alternatives discussed fail to provide alternatives that reduce or avoid significant impacts to Land Use, Transportation/Circulation/Parking, and Visual Effects and Community Character. The Executive Summary fails to describe a range of

AA-1

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.

AA-2

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

AA-2 (cont.)

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).

AA-3 With respect to the adequacy of the project description, 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.

The Cliffridge property's size is discussed in EIR Section 3.4.2.2: "The existing Cliffridge property is 1,792 square feet of GFA."

The FEIR has been revised to provide all relevant discussions of the Existing with Improvement Alternative within the alternatives section of the document, Chapter 9.0. This provides clarity to the reader. The project description for the Existing with Improvements Alternative is included in Section 9.2.1 as follows:

As discussed therein, the Existing with Improvements Alternative involves the permanent use of the Cliffridge property primarily for religious purposes. Therefore, like the Phase1/Phase 2 project, the Existing with Improvements option would be consistent with the Municipal Code.

AA-4 Impacts related to Land Use, Transportation/Circulation/Parking, and Visual Effects and Community Character were found to be less than significant for the reasons detailed in Sections 4.1, 4.2, and 4.12, respectively.

With respect to the projects reasonable range of alternatives, 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/circulation/parking (Section 4.2), or visual effects and neighborhood

Ms. Elizabeth Shearer-Nguyen March 11, 2013 Page 3

reasonable alternatives and mitigation measures that would reduce or avoid significant impacts.

Environmental Setting

AA-5

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 been 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.⁶

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.

AA-6

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.

AA-7

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 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.

AA-8

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.

AA-4 (cont.)

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.

AA-5 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.

San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislans (1994) 24 Cal. App.4th 713.

AA-6	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.
AA-7	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 archeological resources are discussed in Section 4.7. As detailed therein, no previously recorded cultural resource sites are located with 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.
AA-8	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."

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

		AA-9a	See response to comment AA-5.
	Ms. Elizabeth Shearer-Nguyen March 11, 2013 Page 4	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-9a AA-9b AA-9c AA-9d	The environmental setting should clearly state the project site was designated as open space at the time the City committed to a Hillel project on this site in 2000. The environmental setting must describe any inconsistencies between the proposed project and the La Jolla Community Plan. The environmental setting fails to describe the inconsistency of placing a student center in this single family residential neighborhood with the Community Plan's goal of maintaining La Jolla as a primarily residential-oriented community by protecting its residential areas. This is a particularly valid issue for the residential neighborhoods in proximity to the University of California at San Diego. The environmental setting also fails to describe the project's inconsistency with the Community Plan's goal to "[m]aintain the character of La Jolla's residential areas by ensuring that redevelopment occurs in a manner thatpreserves streetscape themes and allows a harmonious visual relationship to exist between bulk and scale of new and older structures."	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
AA-10	The DEIR evaluates the Phase 1/Phase 2 Project and the Existing with Improvements Project in equal detail. The environmental setting fails to describe the Existing with Improvements Project's inconsistency with the Community Plan policy requiring residential development comply with the hardscape and streetscape recommendations identified within the residential element of the Community Plan.		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
AA-11	The environmental setting inaccurately portrays the language of the La Jolla Shores Planned District Ordinance (LJSPDO) which allows "[c]hurches, temples, or buildings of a permanent nature, used primarily for religious purposes." The DEIR improperly paraphrases the LJSPDO to say the LJSPDO allows "churches, temples or buildings for religious purposes."		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
AA-12	The environmental setting constitutes the baseline physical conditions against which to compare the project to determine whether an impact is significant. The DEIR's failure to accurately describe the environmental setting is a fundamental flaw in the DEIR that requires the City to correct significant errors and omissions in the environmental setting, then recirculate the DEIR for public review in order to allow the decision-makers		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.
	and the public an opportunity to fully consider the impacts of the proposed student center. The DEIR Does Not Provide an Accurate and Consistent Project Description Throughout the DEIR. "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." Much like the situation in County of Inyo, the Court has ordered the City to evaluate the impacts of a student center on the project site before approving the site development permit, right-of-way vacation, or deviation for the project. Despite this requirement, the reader must go deep into the project description to	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

County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 193.

RTC-186

AA-9d (cont.)

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.

- AA-10 See responses to comments AA-5 and AA-9c.
- 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.

Ms. Elizabeth Shearer-Nguyen March 11, 2013 Page 5

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.

AA-13

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 acreage 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.

AA-14a

The project objectives are internally inconsistent and clearly 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.

AA-14b

AA-14c

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

AA-13 See response to comment AA-2.

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:

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.

AA-14a (cont.)

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.

AA-14b See response to comment AA-15a.

AA-14c 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 Cliffridge 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 project description fails to describe the right-of-way vacation in meaningful detail. The project description does not quantify the amount of land gained by the right-of-way vacation and fails to describe the narrowing of La Jolla Scenic Drive North by two feet allowed by the right-of-way vacation.

AA-17

AA-18

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 stultifies the objectives of the preparation of an EIR. The project description fails to note the current use of the Cliffridge property is a code violation for which the Neighborhood Code Compliance Division maintains an open case.

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 Cliffridge 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 Cliffridge property will require an amendment to the LJSPDO. The project description fails to include an amendment in the list of discretionary approvals.

AA-19

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-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 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.

^{*} County of Inyo, supra, 71 Cal.App.3d at pp. 192-193.

AA-17	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.
AA-18	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.
AA-19	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.

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requires that the DEIR consider the reasonably foreseeable consequences of the project. The DEIR artificially limits the use and occupancy of the student center based on a flawed summary of the historic activities of Hillel with no fixed center. It is reasonably foreseeable that Hillel will be able to increase the number of activities and the attendance with a fixed student center rather than random locations. The project description should describe use of the center at maximum occupancy rather than artificial limitations that cannot and will not be enforced.

AA-20

The project description provides two different sizes for the student center building but fails to explain the reasons for the discrepancy in the gross floor area of the building. The project description describes the anticipated use of the Library/Chapel and the Leadership Building but fails to describe the anticipated use of the Student Center.

AA-21

The project description wrongly states there are no specific parking regulations for the proposed use in the Municipal Code. This is inaccurate. If the project is a structure of a permanent nature used primarily for religious purposes, then the parking regulations for churches and places of religious assembly should apply.

AA-22

The project description fails to describe the wall along La Jolla Scenic Drive North that extends for nearly 150 feet but does describe the retaining and site walls along La Scenic Way, La Jolla Village Drive and Torrey Pines Road.

AA-23

In the History of Project Changes, the DEIR fails to note the use of the Cliffridge property for administrative offices is a code violation and an active case is pending in the Neighborhood Code Compliance Division.

The DEIR Does Not Contain A Sufficiently Detailed Analysis

California Courts have favored specificity and the use of detail in EIRs. An EIR must provide a reasonable, good faith disclosure and analysis of the project's environmental impacts. ¹⁰

LAND USE

AA-24a

AA-24b

The proposed student center should be compared to the baseline land use designation of Open Space in the La Jolla Community Plan at the time the City committed to a definite course of action by entering into exclusive negotiations with Hillel for the purchase of Site 653. The existing conditions should state the residence at 8976 was converted to administrative offices illegally in 2003. These offices are a code violation and Hillel is relying on the City's approval of the project to correct the existing code violation. The existing conditions fail to recognize the existing code violation and

AA-20

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.

AA-21

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

⁹ CEQA Guidelines §15378(a); Laurel Heights Improvement Ass'n v. Regents of the University of Culifornia, (1988) 47 Cal.3d 376.

¹⁰ Laurel Heights Improvement Ass'n, supra, 47 Cal.3d at 392.

AA-21 (cont.)

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.

AA-22 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.

AA-23	See response to comment AA-18.
AA-24a	See response to comment AA-14c.
AA-24b	See response to comment AA-18.

Section 4.1.1.1 has been revised in the recirculated EIR (December AA-25 2013) as follows: Ms. Elizabeth Shearer-Nguyen March 11, 2013 The Planning Context of the Environmental Setting, Page 8 Section 2.5 of this EIR, describes the land use plans and development regulations that apply to development of the use of the residence for administrative offices, a use not allowed in the single family the project. zone of the LJSPDO. AA-26a A request for a Deviation from Parking Regulations has been added AA-25 The Land Development Code section erroneously refers the reader to Section to the list of discretionary actions under the Existing with 2.6.5 for a detailed discussion of the Land Development Code, The DEIR does not include a section 2.6.5. Improvements Alternative. See FEIR Section 9.2.1. AA-26a The proposed deviation for the Existing with Improvements Option would allow AA-26b Upon occupation of the new facilities under the Phase 1/Phase 2 six parking spaces in a zone that is specifically regulated to prevent the excessive paving project, the temporary use of the Cliffridge property would expire and of single family residential lots to provide more parking than typically warranted for a revert back to single dwelling unit use. To identify subsequent single family residence. This is a significant land use impact directly caused by allowing AA-26b a non-conforming use. Should the Cliffridge Property be abandoned by Hillel in the ownership or residents of the Cliffridge property would be future, this will create a non-conforming residence specifically disallowed in the Campus speculative and beyond the scope of the requirements of CEQA; AA-26c Impact Overlay zone. This is a conflict with the "mini-dorm" regulations adopted by the however, there is no plan for the Cliffridge property to be used as an 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 extension of the project. AA-26d deviation will result in a significant land use impact due to its inconsistency with the land development code. With regards to the cul-de-sac, the ROW vacation would be abandoned to provide landscaping, a pedestrian/cyclist parkway, The DEIR fails to recognize the inherent conflict in determining the proposed AA-27 and park-like amenities, and would not be utilized for parking as student center is a "building of a permanent nature, primarily used for religious purposes" but not requiring the project to comply with the parking requirements for religious detailed in EIR Section 3.4.2.1(f). institutions in the land development code. Either the project is not a "building of a permanent nature, used primarily for religious purposes," thus causing a significant land AA-26c See response to comment AA-26b. 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. AA-26d See response to comment AA-26a. AA-28a 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 AA-27 With respect to the proposed use, see response to comment AA-9c. AA-28b allowed. Approval of the student center may set a precedent to allow over 50 student See also response to comment AA-21. organizations with religious affiliations at UCSD to also build or occupy structures within the single family zone of the La Jolla Shores Planned District. AA-28a See response to comment AA-9c. AA-29 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 AA-28b Section 6.3 of the recirculated EIR was updated (December 2013) to introduction of the student center introduces a level of noise and activity that does not revise information pertaining to the project's potential for precedent currently occur in this single family residential neighborhood. The vacant lot is not used setting. As stated therein, precedent-setting actions include changes 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 in zoning, a general plan designation, or general plan text, or the 10:00 pm. No other development in the immediate vicinity presents a 170 foot unbroken approval of exceptions to existing regulations that could provide

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.

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).

AA-28b (cont.)

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.

AA-29 With respect to the designation of the use of the project, see response to comment AA-28a.

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

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AA-30

The Existing with Improvements Option is not an allowed use in the single family zone of the LJSPDO. Although structures of a permanent nature used primarily for religious purposes may be allowed, Hillel 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.

AA-31

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

AA-32

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.

AA-33

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.

TRANSPORTATION/CIRCULATION/PARKING

AA-34 AA-35 The existing conditions fail to acknowledge 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 effected 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.

AA-36

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 impact 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.

- AA-30 See the response to comment AA-3.
- AA-31 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.

- AA-32 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.
- AA-33 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.

AA-34 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. AA-35 The Phase 1/Phase 2 project would generate a total of 8 peak hour

AA-35 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.

AA-36 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.

La Jolla Village Drive/Torrey Pines Road:

- AM peak 52.8 sec (seconds of delay), LOS D
- PM peak 37.3 sec, LOS D

La Jolla Village Drive/La Jolla Scenic Way:

- AM peak 16.7 sec, LOS B
- PM peak 26.3 sec, LOS C

AA-36 (cont.)

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.

		1	
		AA-37	See the response to comment AA-19.
	Ms. Elizabeth Shearer-Nguyen March 11, 2013 Page 10		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.
	analysis for the various intersections studied. Therefore, the analysis is flawed and fails to identify significant impacts to transportation/circulation/parking.	AA-38	See response to comment AA-36.
AA-37 AA-38	The traffic impact analysis relies on artificial limitations on attendance at the student center and fails to evaluate the reasonably foresceable 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. There is no basis for the conclusion that 80 percent of the students attending the	AA-39	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.
AA-38	student center would walk and the remaining 20 percent would arrive with two students per vehicle. The traffic study should sample at least three similar sites in a similar environment and count entering and exiting vehicles to the site and adjoining areas. It is important to capture all vehicle trips that would be utilizing the site. For example, at the UCLA Hillel Facility, many visitors park on the street, however, these are still considered vehicle trips to and from the site. 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 underestimate the impact of the project on transportation/circulation/parking.		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.
AA-39	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 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
AA-40	Table 6 of the Traffic Impact Study Manual requires that a minimum pedestrian crossing of ten (10) pedestrians per hour per approach should be utilized. In some cases, the traffic impact analysis used as little as three (3) pedestrian calls per hour. This number needs to be increased to properly assess the level of service at the signalized interesections.		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.
AA-41	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.	AA-40	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
AA-42	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.		than indicated in City guidelines. It is not clear as to where the commenter noted three pedestrian calls per hour.
	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	AA-41	The recirculated EIR (December 2013) included this information. Please refer to EIR Section 4.2.1.2(b). As stated therein:

AA-42 The project's location in the Parking Impact Overlay Zone is detailed in EIR Section 2.5.4.4:

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.

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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 ½ 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.

AA-43

The project description fails to accurately describe the proposed right-of-way vacation and fails 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 Cliffridge Avenue. Local residents have provided substantial evidence of the hazard of narrower streets in this congested area.

AA-44

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.

BIOLOGICAL RESOURCES

AA-45

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.

AA-43

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.

AA-44

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.

AA-45

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

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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 pre-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 birding 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.

NOISE

AA-49

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.

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

AA-47 (cont.)

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.

AA-48 See response to comment AA-47.

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.

AA-49 (cont.)

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 courtvard 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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VISUAL EFFECTS AND COMMUNITY CHARACTER

AA-50

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 the 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.

AA-51

The DEIR fails to consider the design policies of the La Jolla Community Plan and Local Coastal Program Land Use Plan.

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 170 foot wall along the southern property line that is most visible to the existing single family residential neighborhood.

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 sheer 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 well setback 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 bulk of the adjacent buildings and does not promote harmony in the visual relationships and transitions between new and older buildings. Therefore, the student center will have a significant visual impact.

AA-52

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.

AA-50 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.

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.

AA-53

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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

AA-53

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.

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

AA-54

The cumulative impact analysis must consider the impact of the project when added to other closely related past, present, and reasonably forseeable 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

AA-55

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

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.

[&]quot;CEQA Guidelines §15355

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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.

AA-56a

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.

AA-56b

AA-56c

AA-56d

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. 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

AA-57

CEQA requires the City to adopt feasible mitigation measures in order to substantially lessen or avoid significant adverse environmental impacts of proposed projects.¹² 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.

AA-58

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 birding 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

AA-56a See response to comment AA-14a.

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.

¹² Pub. Resources Code §§21002, 21081(a); CEQA Guidelines §§15002(a)(3), 15021(a)(1).

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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,

Julie M. Hamilton Attorney for

Taxpayers for Responsible Land Use

CC: Mayor Bob Filner

Councilmember Sherri Lightner Project Manager John Fisher Client

CHC

Attachments: Property Department/Engineering and Development Department

Communication dated June 22, 1977.

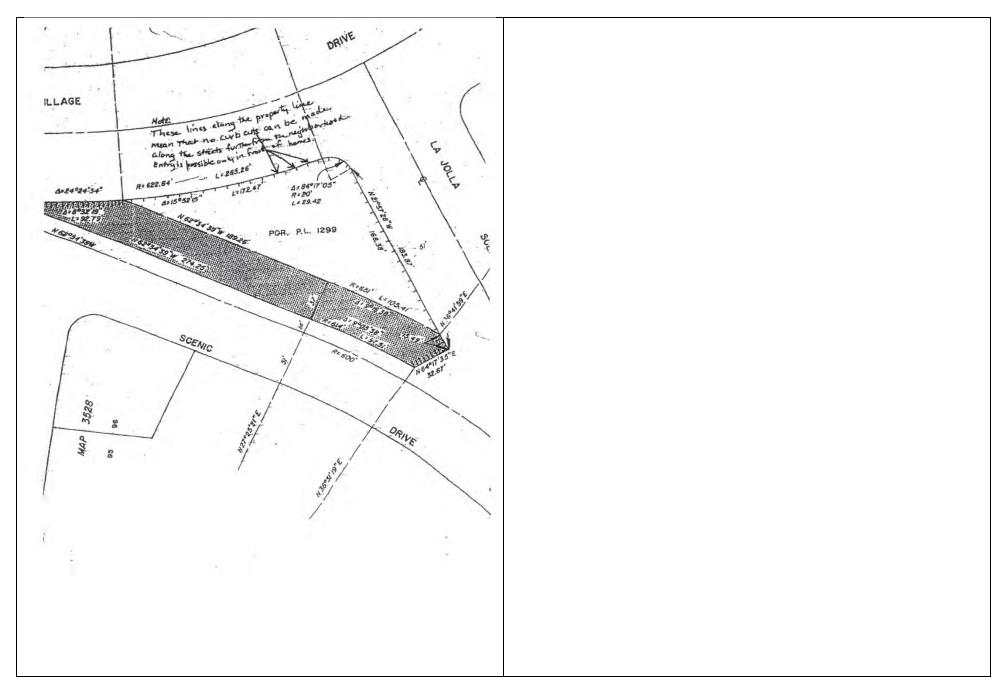
Attachment A	

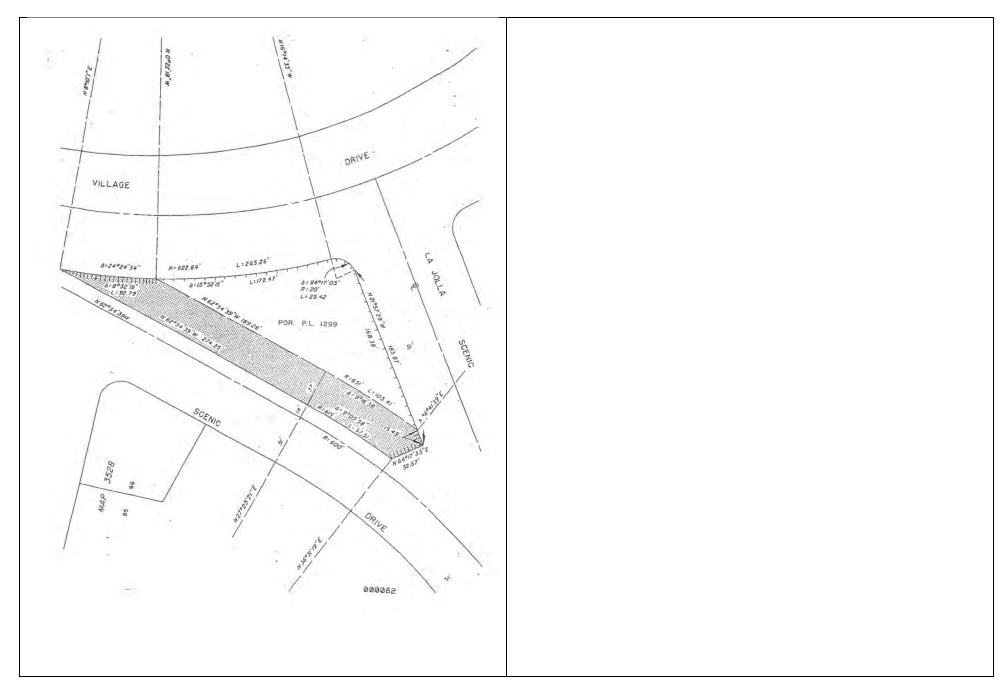
RESPONSE

LETTER

_		
F	June 21, 1977 Property Department - Attention: John Ryan PROPERTY DEPT. 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 Science M.	
	Comments from Senior Planner Stepner conserning a previous attempt to develop &	
	a summary of deducations of named properties and street	

IVILINI WIN STAR WILL PIO May 27, 1977 SAC (Distribution) PROPERTY DEPT. Property Department Proposed Sale or Lease - Por. of Pueblo Lot 1299 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, Property Department JR:pe:evd Attachments





Letter AB 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 AB-1 Earlier today I submitted my comments regarding the recirculated DEIR AB-1 This comment is an introduction to comments that follow. No further for the UCSD Hillel Center for Jewish Life via an attachment to an e-mail response is required. 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

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. 212995/2010101030

Community Plan Area: La Jolla

Council District 1

FROM: Oliver W. Jones, M.D.

8635 Cliffridge Ave.

La Jolla, CA 92037-2113

AB-2

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.

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/pubnotcega.html.

The City provided adequate notice of the EIR under CEQA.-

My comments will be based on review of the most recent document, the recirculated DEIR (RDEIR)

SUBJECT: Hillel Center for Jewish Life (HCJL), until the current edition of their proposed project, was in previously known as Hillel of San Diego Student Center. Although the name is changed (HCJL) the concept remains the same, a UCSD-affiliated Student Center. HCJL seeks SITE DEVELOPMENT PERMIT and PUBLIC RIGHT-OF-WAY VACATION in order to develop the Student Center. The site for this proposal is well documented. If approved, the Student Center will have a significant environmental impact on the single-family residential community of La Jolla Highlands.

The La Jolla Shores Planned District Ordinance (LJSPDO) permits church, synagogue, temple, of permanent nature, USED PRIMARILY FOR RELIGIOUS PURPOSES. The stated description for Hillel of San Diego is a service to Jewish undergraduate and graduate students at institutions of higher education across San Diego county. Students 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 a Jewish community. The Hillel of San Diego Mission Statement states: "To be a vibrant Jewish campus presence and to involve the maximum number of university-age Jews is ways that foster a lasting commitment to Jewish life." "To further this mission, we commit ourselves to the following goals"

AB-3

- > 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 society
- Advocating for Jewish student needs on campus and in the community

AB-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.

- Linking the campus community to a 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.

This does not appear to show the proposed Student Center being used "primarily" for religious purposes. In contrast, at least two of the colleges at UCSD, Revelle and Muir, offer beginning through advanced courses on the Hebrew language and Judaic history, culture, religion. The RDEIR should explain how the proposed Center is to be used primarily for religious purposes. More accurately it is simply a student center, a study center with some office space, a kitchen for social gatherings, rest rooms, showers and as such these are not permitted uses—university facilities are not allowed in the LJSPDO.

AB-4

Hillel has occupied a single-family home at 8976 Cliffridge Ave. since 2004, converting its use to administrative offices for all of Hillel of San Diego. This too is in violation of the LJSPDO; singlefamily homes in La Jolla Highlands cannot be converted to multiple offices. In spite of complaints from neighbor residents, City has thus far refused to act on this violation. The home has offices, not a place for worship and certainly not a place used PRIMARILY for worship. The RDEIR should explain justification for this violation and should provide information as to who owns that property. S.1 Project Synopsis describes activities at 8976 Cliffridge Ave. as "administrative offices, one-on-one counseling and meetings with students" Please help me understand how these activities constitute use "primarily for religious purposes"? S.1 Project Synopsis also describes situations in which Hillel would seek permanent use of the home at 8976 Cliffridge Ave., but it is not clear the intent for use. Please clarify this and also clarify how Hillel intends to obtain ownership of that property. The final sentence in S.1 Project Synopsis, implies the 8976 Cliffridge property might be converted to permanent use (offices) under certain circumstances in the project proposal. Please explain how Hillel intends to acquire the 8976 property. Again, who currently owns that property? This begs the question, if Hillel can acquire

AB-4 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.

AB-4 (cont.)

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.

the single-residence property and convert it to office use in violation of the LJSPDO, what is to keep other individuals from selling their residence to another religious-affiliated organizations for conversion to a "student center" or administrative offices in a residential neighborhood? There are at present some 50 or so certified organizations with religious affiliation on the UCSD campus. Thus far City has shown remarkable reluctance to uphold the LJSPDO code for single-family residential use. This is a serious precedence.

AB-5

AB-6

S. 1.2- Within the RDEIR, Hillel describes a survey of Jewish students at UCSD including a result that 80% of those responding intend to walk from campus to the proposed student center. Responding students have a vested interest in the proposed center being constructed and of course, a vested interest in making it appear that most would walk thus helping to mitigate impact on traffic and parking issues. A survey under these circumstances is fatally flawed. Why the location at the southern end of UCSD campus? Distance from the proposed construction site to the most distal end of student housing on campus is 1.9 miles. Is the proposed center only for those students residing at the southern end of UCSD? Do most Jewish students have university residence on Revelle or Muir campuses, nearly 1 mile from the propose site? What percent of

AB-7

S.5- Description of alternative sites is confusing; the primary alternative sites appear to be simply variations on the project scope and with one exception (Site 675) no alternative for the location. The RDEIR fails to offer a reasonable range of alternatives, including site, that could affect impacts. There is no discussion of impacts on Land Use, Transportation/Parking, Neighborhood Character. One alternative, the Reduced Project, eliminates the Library/Chapel (15% of total) plus the second floor of the Student Center but retains use of 8976 Cliffridge

Jewish students live within the most proximal colleges, i.e.

Revelle and the most distal?

AB-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.

As detailed in Section 3.1 of the DEIR, one of the project objectives AB-6 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. AB-7 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 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

AB-7 (cont.)

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.

AB-7 (cont.)

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.

residence thus the Reduced Project results in a larger student center than the primary proposed project (Phase 1/Phase 2).

AB-8 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 653) 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

AB-9 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 653 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.

AB-10 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

AB-11

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 15% 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

AB-7 (cont.)

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.

- AB-8 The Recirculated EIR (December 2013) contains a map with the location of the Site 675 Alternative within Chapter 9, Alternatives (see Figure 9-1).
- AB-9 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.

- AB-10 See response to comment AB-4.
- AB-11 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

AB-12	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	AB-11 (d	rooms, as well as the outdoor courtyard space. The kitchen would be used to prepare traditional meals during religious holidays.
AB-13	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	AB-12	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
	two of UCSD colleges, offer extensive course curriculum for study in Hebrew and Judaism.	15.46	response to comment AB-4.
	3.2.2 Purpose and Activities Overview	AB-13	See response to comment AB-4.
	This section serves to emphasize the proposed student center will not be used primarily for religious purposes, rather cultural and social responsibilities.	AB-14	See responses to comments AB-3 and AB-11.
	3.3.1 and 3.3.1.1 Phase1/Phase 2 and SDP	AB-15	The Phase 1/Phase 2 project is analyzed in relation to applicable LJSPD ordinance design regulations, including the La Jolla Shores
AB-15	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		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.
AB-16	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 3 buildings clustered within an approximate center of the site. The roof, at its highest		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
AB-17	point will soar to a height of 30 feet. The center presents a wall of building some 145 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 overwhelms neighborhood		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
AB-18	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		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
	6		

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.

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

AB-19 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.

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.

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AB-20 A street right-of-way vacation as proposed would narrow the street hardscape 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.

AB-21 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

AB-22 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 UCSD 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 AB-23 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 Glonbrook 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.

AB-20 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.

AB-21 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.

AB-22

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 "[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.

AB-22 (cont.)

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.

AB-23 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.

AB-25

AB-24 Presently, traffic flow on to Cliffridge Ave. and hence to La Jolla Scenic Dr. N from the intersection of Torrey Pines Road and Glenbrook Way, is substantial especially during morning and evening commuting hours. With street vacation on La Jolla Scenic Dr. N., traffic impact would be even more significant. The RDEIR needs more clarity in addressing the cumulative impact of the Venter Institute and HCJL

AB-25

The Hillel project seeks a curb cut on the west side of La Jolla Scenic way at the entrance to the Student Center parking area. A curb cut at site proposed results in a significant traffic hazard. At the intersection of La Jolla Village Drive and La Jolla Scenic Way, cars in two lanes turning left from La Jolla Village Drive plus cars turning right at the same intersection, all merge into a single lane only to become impeded by cars slowing to turn into the Student Center parking area. Within the past month or so, there have two significant collisions, one involving 3 cars, at this intersection. The curb cut proposal offers more hazardous conditions for drivers and vehicles. A curb cut on La Jolla Scenic Way may also violate the dedication of La Jolla Scenic Way as part of the mitigation of development along Gilman Drive.

AB-26 The RDEIR states that for the most part, maximum attendance at the Student Center will be approximately 50 persons; large events, i.e. Shabbat meals will not be held at the Center but of course this estimate is not binding and completely unenforceable. It is in Hillel's best interest to encourage as many students as possible to share what the Center has to offer thus projections should be based on maximum or peak use instead of an estimate both unrealistic and unenforceable. It is the occupancy load of the Center that is critical. The proposed Center will have approximately 3000 sq. ft. of assembly space, approximately 980 sq.ft. of chapel/library and 1000 sq.ft. of office space offering an approximate occupant load of 290 individuals. It is this maximum use figure that is critical.

AB-27 In contrast to a statement in the RDEIR, "there are no specific parking regulations for the proposed use of Phase 2 of the Hillel Student Center Project in the City's Municipal Code", the LJSPDO and the Municipal Code section 1510.0107 (a) and

AB-24 See response to comment AB-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.

Additionally, there is no known requirement for "mitigation of development along Gilman Drive."

AB-26 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.

RESPONSE

LETTER

142.0530(c), Table 142-05F state parking regulations. If the RDEIR argues that Hillel is primarily a religious organization then code requires "I parking space per 3 seats or 30 per 1000 sq.ft. of assembly area if the seating is not fixed". Hillel proposes 27 parking spaces equivalent to 900 sq. ft. of assembly area. The three buildings proposed by Hillel amount to approximately 6500 sq.ft. Figures in the RDEIR show 120 seats thus requiring at least 40 parking spaces. Other estimates based on various calculations of assembly area suggest a parking space need of between 48 and 90 spaces. Add to this the loss of 6-8 street parking sites if there is a street vacation, the negative impact on the neighborhood because of inadequate onsite parking and spillover on to neighborhood streets is quite apparent. If the Center is not a religious institution, parking is still an issue because of the number of individuals who might occupy the Student Center facilities during peak activity. The proposed number of parking spaces falls short of the minimum required for the number of users expected to use the Student Center. The RDEIR fails to provide the number of staff personnel expected to use the facility parking area daily. This number reduces further parking spaces available for student attendees. Students will park on the surrounding residential streets producing a negative impact on the neighborhood.

AB-28

The RDEIR states that approximately 50 students will be at the student center during the day and evening. As noted above, the occupant load for the center is around 290 and Hillel rightly will try to encourage all Jewish students to be part of the Hillel Student Center. Thus the RDEIR should consider maximum use because any smaller number is unenforceable. Even 50 students at one time, both inside the buildings or in outside assembly space will create noise. The Center would be available to student groups until 10:00 PM and again noise control is unenforceable. Imagine a neighbor hosting a social gathering for 40-50 people one or more nights each week until 10:00 PM. Noise from people attending a student center activity will impact the neighborhood.

Visual Effects of the Student Center

Page 4. 12-20: 4.12.4.1 a. Phase1/Phase 2

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AB-27 With respect to project trips, see response to comment AB-22.

With respect to loss of parking, see response to comment AB-21.

Hillel would have in place an approved Parking Demand Management Plan as a condition of approval for its larger events.

AB-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 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.

		AB-29	Potential visual impacts under the Phase 1/Phase 2 project are
AB-29	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 DREIR 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		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.
	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 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		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.
	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		With respect to the project's consistency with bulk, scale, and community character, see response to comment AB-15.
AB-30	exceeds the surrounding homes in bulk and scale and it would be just a start. Hillel has stated previously intent to expand in	AB-30	See response to comment AB-3.
	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.	AB-31a	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
	Summary		Development Code Regulations (including the Coastal Overlay
AB-31a	 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. 		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
AB-31b	The RDEIR does not provide evidence the proposed Student Center will be used primarily for religious activities. Statements in the document support the concept		secondary effects would result and impacts were determined to be less than significant.
	of a social/cultural center for UCSD students. Thus this proposed land use is in direct violation of the LJSPDO.		Additionally, Section 4.12 of the EIR provides an analysis of the project's development features as they relate to City codes.
AB-31c	3. For the past 9 years, the home at 8976 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		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.

AB-31d	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	AB-31d	See response to comment AB-19.
AB-31e	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	AB-31e	With respect to the traffic analysis of Glenbrook and Cliffridge, see response to comment AB-22. With respect to the inclusion of Venter Institute as a cumulative project, see response to comment AB-23.
AB-31f	Way into the Student Center parking area. 6. The RDEIR offers misleading figures concerning the number of students expected to utilize the Student Center.	AB-31f	With respect to occupancy issues, see response to comment AB-26.
	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		With respect to the adequacy of parking, see response to comment AB-27.
AB-31g	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.	AB-31g	See response to comments AB-15. And AB-18.
AB-31h	8. An EIR 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 675 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.	AB-31h	See response to comment AB-7.
	I appreciate the opportunity to respond to this RDEIR. Sincerely, American description of the RDEIR.		
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Letter AC

Mrs. Paula B. Jones 8635 Cliffridge Avenue La Jolla, California 92037 March 3, 2013

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

> Re: UCSD Hillel Center for Jewish Life

Dear Ms. Shearer-Nguyen:

This letter is in regard to the DEIR concerning the proposed construction of Hillel Center for Jewish Life at Site #653.

My opinions on this matter are based on having lived on Cliffridge Avenue since 1968. We were the second family to move into this Watts & Gentry development. The street was still dirt. Our four children grew up in this quiet neighborhood and attended Torrey Pines Elementary (one daughter returned as a teacher 20 years later). Many families came and still come because of proximity to UCSD. We are a low-key neighborhood...a nice balance of grandparents and young families; considerate of our neighbors; fairly quiet.

This site is a triangle of land bordered north by La Jolla Village Drive and UCSD: bordered west by Torrey Pines Road and Ventner Research Institute (under construction); bordered east by La Jolla Scenic Way, and bordered south by La Jolla Scenic Drive and a single family neighborhood.

- AC-2 - The DEIR does not recognize that the proposed development violates the La Jolla Shores Planned District Ordinance: University facilities do not belong in the single-family residential area. The residential location of Hillel Center for Jewish Life would set a precedent for the many religiously affiliated organizations presently on UCSD campus.
 - The traffic analysis fails to consider the over-all effect of the Ventner Institute. It would seem this structure of approximately 45,000 sq. feet would provide room for enough employees to have a major impact on traffic on La Jolla Village Drive and Torrey Pines Road. Even now, we see the effect on Glenbrook Drive (the cross street to Cliffridge Avenue, coming east off of Torrey Pines Road). Commuters use Glenbrook as a cut-through to La Jolla Scenic Dr. and/or La Jolla Scenic Way to La Jolla

This comment provides introductory information and does not raise AC-1 any substantive issues related to the adequacy or accuracy or the EIR. No additional response is required.

AC-2 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.

AC-1

AC-3

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.

AC-4	Village Drive to avoid the already congested intersection of Torrey Pines and La Jolla Village Drive. 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 Ventner Institute and the right-turn only limitation out of the student center parking lot. The analysis falls to provide traffic volumes for existing conditions on Cliffridge Avenue and Glenbrook Way. Would this not be necessary for comparison of the future effects of the student center?	AC-4	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
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-5	EIR (December 2013). 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
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. The use of 8976 Cliffridge Avenue, currently used for Hillel's 		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-7b	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-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
AC-8	 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. 		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.
AC-9	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		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
AC-10	 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. 		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

AC-6 (cont.)

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.

AC-7a See response to comment AC-2.

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.

AC-9 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.
AC-10 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.

		AC-11	See response to comment AC-8.
AC-11 AC-12	 The esthetic of this building is incompatible with the neighborhood. It is an attractive design, but at 6,500 sq. feet, with no surrounding open space to soften the impact, it is too massive for a neighborhood of mostly one-story unimposing homes. Hillel is vague about the number of people gathering at the center for 	AC-12	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.
	events. There have been several revised versions of what kind of events and how often and when. Whatever promises are made, they will be unenforceable. The residents have reason to question this impact.		The Site Development permit would be subject to conditions of approval which would include attendance capacity limits. Specifically,
AC-13	Finally, the parking (or lack of) has not been adequately addressed. The HCJL by law is required to provide 48 onsite parking spaces to be compatible with the size of its approximately 1,600 sq. feet of assembly area. They provide 27. Because of the proposed street vacation, they require removal of eight existing on-street parking.		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
AC-14	The three other religious institutions in our midst were considerate of the scale and spirit of this area when they built or expanded. Unfortunately for Hillel, the limitations of this property prevent them from doing the same.		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
	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.		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.
	Ms. Schearer-Nguyen, I would respectfully request that you take note of my comments.		Please also see EIR Section 3.6 for a history of the project.
	Paule B. Frus Paula B. Jones	AC-13	With respect to required parking, 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

AC-13 (cont.)

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.

AC-13 (cont.)

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.

AC-14 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.

Good day, AD-1 I am sending this email to express my concerns on the land use of the proposed Hillel site. I own two properties in the neighborhood. First let me say that all of my concerns stem strictly on preserving the neighborhood that we have. We have a beaufild and charming neighborhood that is very diverse. Tried that allowing this transaction opens the door to others in the future that would take away from what we have. Here are some of my main concerns: AD-2 Traffic. The construction of this project will create an even worse traffic situation on La Jolfa Scenic North than we already have. This is area has very high blike and pedestrian traffic as well. There are numerous wrecks in this area to begin with due to the fact that this road heading south narrows quickly into one har. This is where the entrance/exit is also planned to be for the Hillel site. PLUS no one has taken into consideration the new office buildings that just went up (the first of four I might add). They have a right turn ope xit onto Torrey Pines Road. Many of these people will be flowing through the neighborhood and ending up on this exact same location. AD-4 The plan is to narrow the portion of La Jolfa Scenic in front of the center. This road is already narrow and I feel this will lead to accidents. AD-5 Another concern are the dumpsters. I hate to say it but with dumpsters come three very negative things; noise during removal, rats, and dumpster divors. AD-6 I'm not really sure why the city would even sell the land to the group who planned to build this community center because it isn't a single family residence. It's bad enough that the single family residence at the end of Cliffridge Ave is being used as offices already by this group which is in direct code violation. That lack of regard troubles me.	AD-2 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 are 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 would be required. To achieve the required stopping sight distance would be required. To achieve the required stopping sight distance would be required. To achieve the required stopping sight distance would be required. To achieve the required stopping sight distance would be required. To achieve the required stopping sight distance. AD-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) of the EIR. As stated therein, the Venter Institute has revised the site plan to only provide access from Expedition Way (ful access of riveway). 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 cumul
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AD-3 (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.

- AD-4 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.
- 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.

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."

AD-6 (cont.)

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).

AE-2

Letter AE

Kuster 8470 Whale Watch Way La Jolla, CA 92037

Ms. E. Shearer-Nguyen Environmental Planner 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. 212995 (hereforth: "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.

AE-1 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 for 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.

AE-2 The current block of 8900 is used for pubic 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

AE-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.

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

AE-4 AE-5	non-car travelers to share the road safely. The street vacation would reduce the safety for all those transiting the street. Finding (a) cannot be made. 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. Pages 71 through 77 of (La Jolla) UCSD Hillel Center for Jewish Life / Project No. 212995 / 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. 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,	AE-2 (c AE-3 AE-4 AE-5	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 AE-1. See response to comment AE-1.
	The Kusters		

Letter AF

Larson-Kuster 2420 Torrey Pines Road B101 La Jolla CA 92037

Ms. E. Shearer-Nguyen Environmental Planner 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. 212995 (hereforth: "Student Center")

Dear Ms. Shearer-Nguyen

AF-1 I am writing to let you know of a serious inaccuracy 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 topic of the inaccuracy is Precedent. When reviewing Section 6.3 of the DEIR, one reads:

"development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively."

There is no logical path that can lead one to accept this statement as truth. Positioning a Student Center with a self-proclaimed University affiliation, purported to be religious, in the single-family residential area sets a precedent for future organizations to replicate this development.

There are scores of religiously affiliated organizations affiliated with UCSD. To allow one organization to build an industrial sized building in a single family neighborhood is essentially the equivalent of allowing all other religiously affiliated organizations associated with UCSD to do the same. As there would be precedent set for positioning this non-R or R-1 zoned structure in the neighborhood, it can safely be stated that it would be a matter of time that the existing homes could eventually become non-R (residential zoned) or non-R-1 (residential zoned) structures.

There would be no justifiable way to stop the expansion of UCSD organizations into and on top of the established single-family neighborhood. Each organization would be able to cite the Hillel development as precedent and support for their development. The development of Hillel's Student Center would create a path to pave over an existing quiet and lovely neighborhood, which was built, ironically, to support the UCSD professorial staff, which transferred to the area at the birth of UCSD.

AF-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.

AF-1 (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.

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. See response to comment AF-1. AF-2 AF-2 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

		Letter AG		
	From:	Serafeim Masouredis <smasoure@ucsd.edu></smasoure@ucsd.edu>		
	Sent:	Monday, March 11, 2013 4:16 PM		
	To:	DSD EAS		
	Subject	Project Name: UCSD HILLEL CENTER FOR JEWISH LIFE, Project No.: 2010101030		
AG-1	Sir/Madam We are writing to opp	to se the proposed construction of the Hillel Center for Jewish Life. Our reasons for opposing the		
AG-2	project are: The impact of Hillel on the traffic flow at the intersection of L. J. Village Drive and Torrey Pines Road would be very disruptive if not devastating, considering the major traffic impact from the Venter institute now under construction. Concerns about the traffic problems expected on completion of the institute are being discussed by Councilwoman Lightner, the mayor, UCSD and a number of La Jolla residents. It seems unreasonable to plan for more			
AG-3		ongested area square foot Hillel structure disrupts the architectural unity of the surrounding neighborhood and adent) similar proposals for religious student centers in single family residential zones adjacent to		
	UCSD.			

AG-1 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.

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.

AG-3 (cont.)

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 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.

Letter AH

McCann 8866 Nottingham Place La Jolla, CA 92037

Ms. E. Shearer-Nguyen Environmental Planner 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. 212995 (hereforth: "Student Center")

Dear Ms. Shearer-Nguyen

First, thank you for providing the Re-Circulated Draft EIR for the subject project, previously known as Hillel of San Diego Student Center II. Upon review of the documents, we offer the following comments and questions for consideration.

AH-1 Traffic Report:

AH-2

The traffic study report is flawed in many ways. There is no analysis of traffic west of Gilman, which is adjacent to the location of the proposed Student Center. Why are they not including the area immediately adjacent to the proposed building? Why have they not included the traffic impact of the newly developed J. Craig Venter Institute? Shouldn't the added traffic that will be created by the Venter Institute be included in the traffic study? There is an omission not only of the traffic and trip generation information for the Venter Institute; but also of the other three buildings slated to be developed in that same immediate area. Further, there is no analysis of traffic for the adjacent street corners of Villa La Jolla & La Jolla Village OR Cliffridge & Glenbrook, for the Student Center – it is missing from the traffic report.

The bicycle network is called out as not existing on La Jolla Scenic Way and La Jolla Scenic Drive. While the roads may not be specifically marked with bicycle lanes, is it not arguable that the fact that bicycles transit daily, multiple times a day, from La Jolla Scenic Drive North to the west onto La Jolla Scenic Drive North and to the intersection of Torrey Pines and La Jolla Village Drive, should be considered as a traffic consideration? Pedestrians, bicyclists, skateboarders, and those transiting on scooters have used the northern most end of La Jolla Scenic Drive North as a main thoroughfare for University access. To create a narrower street will disallow those transiting without cars from having a safe area to travel. The traffic report is faulty for not taking into account the daily number of non-car travelers on the north end of LJ Scenic and the impact that the development of the Student Center will have on their safety.

AH-1

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.

AH-2

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.

		AH-3a	With respect to noise, pr
	Noise Report:		EIR Section 4.8. Spec
AH-3a	The noise report is a partial study, at best. There is no study of the noise levels at		potential for on-site noise
AH-3b	maximum capacity of the Student Center. Where is the study for the noise impact for the		As shown in Table 4.8-1
AH-3c	outdoor use of the lot? What enforcement will be provided to contain the noise		average sound levels
AH-3d	associated with the clean-up of events that end at 10pm? Clean-up for events can take		maximum of 50 dB(A) from
An-su	over an hour, and cause loud clanging and banging near dumpsters outside of the		45 dB(A) from the hour
	buildings. How will the Student Center manage the containment of the loud outdoor		sources anticipated from
AH-3e	noise? If the Student Center expects its participants to come to the multiple events		the courtyard and pa
	throughout the week by foot, then shouldn't another study must be performed to analyze		,
	the noise associated with students walking through the adjacent neighborhood?		conversations, meeting
	nulfic Coulcy 7		additional visitors could
AH-4	Parking Overlay Zone: The area of the development of the Student Center is in a Parking Overlay Zone. The		noise sources anticipa
/ W I ¬	DEIR document does not discuss the definition of a Parking Overlay Zone and how a		activities at the courtyar
	building would effect and take critically needed parking spots away from this zone. In		explains that based on
	order for the proposed project to be built, they must have the approval of a Street		these exterior areas, nois
	Vacation. Shouldn't this be included in the traffic report?		adjacent residential rec
	A Property Control of the State		evening noise ordinance
	Neighborhood Character:		respect to potential no
AH-5	The character of the neighborhood does not support the inclusion of a Student Center.		concludes that HVAC n
	The Student Center suggests 100 individuals visiting the site on a weekly basis. Only		
	very rarely - during the holiday season - does a home in the adjacent neighborhood have		dB(A) at the adjacent res
	so many visitors in a week. To suggest the proposed structure is in character with the		noise ordinance levels.
	neighborhood suggests that it is typical or normal practice for the homes in the area to		
	host over 100 people every week. The Student Center is not, by its nature and function,		With respect to the Exi
	not in keeping with the character of the neighborhood.		would permanently use
AH-6	The DEIR does not study the foreseeable use of the building, but only the stated proposed		prepared for the project
, 0	use of the building. The maximum capacity of the building far exceeds the proposed		this alternative on a ma
	capacity size of the planned events. There is no enforcement available to maintain the		9.2.1 concludes that no
	proposed capacity once the building is built; thus, the DEIR is flawed as it does not		with Improvements Alte
	include the true maximum use of the building or the foreseeable use of the building. The		measured noise levels,
	focus of the Student Center is to invite and incorporate as many students as are willing to		compared to existing and
	participate, not to limit them based on an arbitrary claim of participation.		compared to existing and
	Visual Effects		Sections 4.8.3.1 and 4.
AH-7	The Hillel organization is using a false baseline for their analysis on visual effects		discussion of potential
	and neighborhood character. They site the condominium complex of La Jolla Shores		special events at the Hi
	Heights and the La Jolla Playhouse as comparison for visual effects. They do not		general daily average a
	include the fact that there is a clear, thick visual screen of vegetation provided by		impacts would be less that
	the La Jolla Playhouse so as to conceal the visual impact of the large structure. They		
	also cannot compare their industrial structure to that of the family development of	AH-3b	An acoustical report was
AH-8	LJ Shores Heights given the Height's large setbacks off of La Jolla Scenic Way and		CEQA and City guidel
∧ı⊐-0	extensive green space. Further, the La Jolla Shores Heights is mischaracterized as a		compatibility, project-relative
	multi-family development. The Student Center faultily compares its project to two		
	developments that are further away from the center than the adjacent single family		Section 4.8. Specifically,

project-related noise impacts are analyzed in ecifically, the EIR discusses whether the se generation would exceed allowable limits. -1, the City Noise Ordinance limits one hour within single-family residential uses to a from the hours of 7:00 a.m. to 7:00 p.m., and irs of 7:00 p.m. to 10:00 p.m. On-site noise m the project site would include activities at patios, which would typically consist of gs, and general social gatherings. While ld be located within structures, the on-site ated from the project site would include ard and patios. Section 4.8.3.1(a) of the EIR n a maximum of 50 speaking voices within pise levels would be 43.4 dB(A) at the closest ceiver. This is less than the daytime and e limits for single-family residential uses. With noise impacts from HVAC units, the EIR noise levels are not projected to exceed 40 esidential properties, also below the allowable

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

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.

AH-5

The project is consistent 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 number of daily visitors, 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.

AH-5 (cor	nt.)
7.11.0 (00.	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.
AH-6	See response to comment AH-5.
AH-7	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.
	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.
AH-8	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.
	AH-7

residences. When comparing the Student Center to the single family homes, the list of reasons the proposed development is out of character with the neighborhood and causes a clashing visual effect is endless: shorter setback; longer widths; greater than 4K square feet footprint; industrial kitchen; ghost floor that creates a maximum use of the facility that matches the equivalent of 3-4 single family homes. What findings can City Council make to claim that the use, size, and footprint are in character with the neighborhood?

Alternate Site

AH-9 There is an omission of reasonable alternate sites. The proposed alternate site, site 675 is not defined in the DEIR. Equity Title Company, upon analysis of the DEIR, could not identify the location on a plat map of the alternate site.

Why is there no alternate site proposed on the eastern, northern, or western edge of campus? If the mission of Hillel is to place the Student Center near where students live, why is there a total omission of alternate sites on the other 350 degrees of the diameter circling UCSD? The proposed site is adjacent to the Theater District and School of Medicine, not nearer the many student housing buildings.

The lack of direction for finding Site 675 makes the DEIR incomplete. In summary for the alternate site issue – there is, in a practical sense, a total omission of a viable alternate site for the development of the Student Center.

AH-10 As a final note,

The proposal of a Student Center by the Hillel organization has been going on for years. The local community has denied permits for the development of the project year after year after year for the clear reason that this is not the appropriate use of land adjacent to single family neighborhood. Nothing has materialized in this DEIR or in the proposed project that materially changes the proposed development that has been repeatedly denied.

We look forward to learning more about the questions posed and receiving clarification on the other points made in the attached.

Thank you kindly,

The McCanns

AH-9

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.

AH-10 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.

Letter Al

2866 Jacoby Creek Road, Bayside, CA 95524 March 6th, 2013

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

Al-1 Dear Ms: Shearer-Nguyen:
Please find attached my rest

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 Moore Mare

Al-1 This comment is an introduction to comments that follow.

		A1-2a	Ownership is not a CEQA-related issue. This comment does not
	ENVIRONMENTAL IMPACT REPORT		raise any substantive issues related to the adequacy and/or accuracy of the EIR. No further response on this issue is required.
	Project No. 212995		
Al-2a	Who is the owner/applicant for 8976 Cliffridge Avenue ("House")?	Al-2b	Upon occupation of the new facilities under the Phase 1/Phase 2 project, the temporary use of the Cliffridge property would expire and
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?		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
Al-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 (s') combined project], as administrative offices by a national Jewish student		is no plan for the Cliffridge property to be used as an extension of the project.
	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 letters re: Notice of Code Compliance Violation, Item 1.)		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
AI-3	"The new facility would provide additional space for religious programs"		in EIR Section 3.4.2.1(f).
	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-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.
	Whitsoever (p.11),	AI-3	Hillel was incorporated in the state of California on July 1, 1992,
AI-4	"Phase 2 would involve development of the 0.8 –acre vacant parcel east of the Cliffridge 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.		"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."
Δ1. Γο	Page 2		
AI-5a AI-5b	Can you please explain why the "Existing with Improvements Option" is bundled into this application? The "owner" for 8976 Cliffridge 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,		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
AI-5c	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 (LJSPDO), amongst other Codes.		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
	Page 4		primarily for religious purposes. The project is not a "student center"
Al-6a	ALTERNATIVES		as the commenter uses the term. The fact that the project is
	No Project Alternative		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
	2		would be a permitted use within the residential zone in accordance with the City Municipal Code.

Al-3	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.
AI-4	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).
Al-5a	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.
Al-5b	The permit process does not require that the owner of the property submit the applications.

Section 6.3 of the recirculated EIR was updated (December 2013) to AI-5c 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 offcampus 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. Al-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, communitybuilding, and spiritual counseling. This is an allowable use in the Single Family Zone.

Al-6a (cont.)

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.

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).

According to the City of San Diego, the ONLY reason the "Hoi in operation is because the applicant requested it. This is in spit original project (6098) under which it was permitted to remain judicial review, to require an Environmental Impact Report. In: Compliance explanation was that the House was part of a new y other project's environmental review was in judicial review), we by the City Council (on December 5th, 2008). Presumably, even "failed" the applicant was permitted to remain in violation (whe staff to justify this?), and wait until this new project 212995 was Internally there is a contradiction (apart from lack of staff consi "Existing with Improvements" is required to undergo environment is the same property for the same uses. Can the California Envis (CEQA) be suspended for the same property and uses, and imparitigation? Al-6c Fundamentally, doesn't the City have to provide evidence for it project will/will not incur significant impacts on the environment evidence in this document that the City has done anything other "House" does not require environmental review if the No Project election of the decision-makers. Al-6d "Furthermore, the No Project Alternative Existing with Improsity in the community planning groups, including the La Jolla Sh could then determine their preference for what constitutes enhanced in the community planning groups, including the La Jolla Sh could then determine their preference for what constitutes enhanced in the community planning groups, including the La Jolla Sh could then determine their preference for what constitutes enhanced in the community planning groups, including the La Jolla Sh could then determine their preference for what constitutes enhanced in the community planning groups, including the La Jolla Sh could then determine their preference for what constitutes enhanced in the same provision in a general zoning plan which benefits a single allowed for the surrounding properties implications of favoritism, spot zoning is not favored practice Whether	the of the fact that the was determined, after 2009, the Code project 149437 (while the which was in fact not heard in though that project ere is the discussion by as in process (fall, 2010?). istency) because the hental review, but the "No tal review, even though it ronmental Quality Act acts? Is that a "deferral" of the determination that a ent? I don't find any or than decide that the eet Alternative is the rovements Option (pp. 4—I neighborhood in concert hores Association (LJSA) need pedestrian The lates to this legal parcel of land by creating an in the area. Because of he exception applied to a single rest, the effect the spot zoning ated by the zoning." Al-6e ernative, the development teley 1.34 acres (a 33 of the Grant Deed. would be less than an	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 Al-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 would reduce grading, and reduce potential impacts
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Al-7a (cont.)
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 (Phase1/Phase2). 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 area of the "House" is 1,792 sq. ft., so add that to the remaining 1,813 sq. ft. + (my guess:) approx. 2,000 sq. ft. of first floor HCJL student center - where are the actual measurements for this? - and then add them together: 1,792 + 1,813 + 2,000 = 5,605 sq. ft. and that ASSUMES removal, not reduction, of the Library/Chapel!

- Al-7b Why would the removal of these structures require less parking? The facility is already deficient in parking either as a "permitted" religious use, or as a "non-permitted" student center. This would in fact allow two non-conforming uses to be incorporated into one project on an area some 17,000 sq. feet greater than the two sites separately summed.
- Al-7c In the absence of numbers, a clear design map, and an area map, it is not possible from the evidence provided by the applicant(s)/staff to many determination, except that this is not an acceptable alternative!
- Al-7d Please note: The initial drawings, prepared for the City Council in May, 2002, showed a building footprint not much more than 7 8,000 square feet at most, with on-site parking.
- Al-8a Page 6
 Site 675 Alternative
 Why would this "... result in greater physical impacts to the environment ..."?

AI-8b

Site 675 was proposed in 2000 – and many times later – as an alternative site for Hillel of San Diego. The site is within the UCSD environs and would allow UCSD to take more responsibility for this project that was so enthusiastically supported by former Chancellor Robert Dynes. UCSD has also supported the off-site parking agreement that permits the "House" to remain. The Fourth District Court of Appeals decision noted of such agreements "... neither of which was permitted by the Land Development Code provisions governing single family residential zones." (p.5 Filed 2/18/09 Taxpayers for Responsible Land Use v. San Diego CA4/1). Site 675's proximity to campus would be ideal for the students and staff, and would solve the underlying issues related to **permanent** religious structures on the campuses of public universities.

There were three potential buyers for the site identified in May, 2006, at the Council hearing. In 2005 a neighbor offered to purchase the site for the community ... and there are community members who are willing to purchase and maintain the still vacant site for a park – as is consistent with the zoning in 2000 when the RFP was first offered: "Designated from 1995 – 2003 asps but NOT dedicated. Bob Manis." (In "miscellaneous" in Appendix.) I believe there is a clause that allows Hillel to sell the land back to the City should the project fail.

Al-7b 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 "[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

AI-7b	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.
	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.
Al-7c	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.
Al-7d	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.

The Site 675 Alternative was determined to be a possible site for the AI-8a 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. AI-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.

Page S-2 S.1,2 Project Objectives

Al-9

Recent legal decisions have challenged overly defined and narrow project objectives.

Over defining a project in order to render the alternatives infeasible is questionable with respect to CEQA judicial decisions.

With respect to the planned area that would facilitate Hillel of San Diego's 'Hillel Center for Jewish Life' project objectives, the University Community Plan has been developed during several decades to facilitate such activities.

I have attached three pages of the plan, and draw planners' attention to the following:

p.10: "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."

p.22 UCSD Long Range Development Plan: "This plan more fully recognizes the importance of UCSD in the community by considering on-campus uses designated by the University's Long Range Development Plan (LRDP) and by seeking appropriate linkages and design interfaces between the campus and the community."

p.183: **D. Special Populations** "...e) encourage larger residential units providing two or more bedrooms for student housing;"

AI-8b (cont.)

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.

Al-9 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.

-10-

Street improvements and other public facilities in support of the 1986 forecast (as revised), above and beyond the 1983 Plan, will be incorporated as part of the North University City Public Facilities Financing Plan and Facilities Benefit Assessment. Further studies on transit improvements and financing are currently being reviewed. These studies include the Metropolitan San Diego Short Range Transit Plan, the North University City Intra-community Shuttle Loop Financing Plan and the Mid-Coast Light Rail Transit (LRT) alignment studies.

B. MCAS Miramar Overflight Impacts

Land use proposals, as well as 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 refining land uses and design standards. This element provides a future vision 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 call for the development of affordable housing within the community and recommends the use of City-owned properties for this purpose. The Plan also identifies density bonuses as a means of encouraging developers to provide moderate-income housing.

F. State Coastal Act

The land use and site preparation guidelines contained in the Plan are consistent with the adopted proposals contained in the North City Local Coastal Program Land Use Plan. The Planning Commission and City Council adopted these proposals affecting the Coastal Zone in March 1981.

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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 Cityowned 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.
- 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.
- 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

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

 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.

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S.3 Areas of Controversy (page S-5)

AI-10

*I believe that the 2004 Project (6098) was approximately 12,100 square feet.

*In 2004 Hillel of San Diego did not own the .771 acre site, and was engaged in the process to lease or purchase the Site and entitlements granted by the May 21st, 2002 Council decision.

August 5th, 2005: The City Attorney concluded that the City should prepare an EIR for Project. This was disregarded by City Staff and an MND was prepared. In 2009 the Fourth District Court of Appeals determined that an EIR was required for that project.

(Had the EIR been prepared by EAS, the community could have avoided three years of legal dispute, incurring huge costs financially, in time spent, and stress!)

*In May, 2006 the City Council made those approvals despite denial of the Project by every single community planning group, and the Planning Commission.

*In June 2006 a legal challenge was filed in opposition to both the certification of the MND, and the Sale of Site 653, in Superior Court (Case No. GIC 867373, Honorable Linda B, Quinn).

*In 2008, Hillel of San Diego proposed Project #149437.

Every community planning group, as well as the Planning Commission denied project 149437. On December 5th, 2008 it was to be heard at City Council but was pulled due to incorrect noticing, Hillel of San Diego then declined to pursue that Project for political reasons.

Al-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.

OFFICE OF

THE CITY ATTORNEY
CITY OF SAN DIEGO

MICHAEL J. AGUIRRE

CIVIL DIVISION 1200 THIRD AVENUE, SUITE 1620 SAN DISCO, CALIFORNIA 92101-4178 TELEPHONE (619) 236-6220 FAX (619) 236-7215

RECEIVED

AUG 0 5 2015

August 5, 2005

LIEVELOPMENT SERVICES

VIA HAND DELIVERY

GARY HALBERT DEVELOPMENT SERVICES DEPARTMENT

Dear Mr. Halbert:

Hillel Project 6098

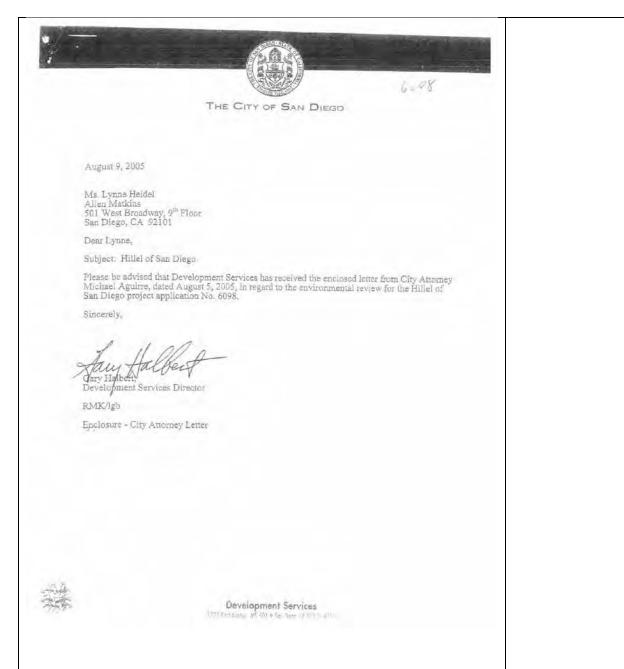
Legal issues have been raised regarding the Hillel Project 6098. I have analyzed those issues and concluded that the environmental analysis for the Hillel Project is not in compliance with the California Environmental Quality Act [CEQA], In order to bring the Hillel Project in compliance with the law, 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

KH:cfq

cc: Keri Katz, Assistant City Attorney
Karen Heumann, Assistant City Attorney
Anita Noone, Assistant City Attorney
Carrie Gleeson, Chief Deputy City Attorney
Douglas Humphreys, Deputy City Attorney
Shannon Thomas, Deputy City Attorney



		AI-11	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.
AI-11	The residents concerns were about far more than bulk and scale! What are the religious programs? (See earlier comments re: Mr. Mark Steele.) What is the envisaged attendance of those programs?		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
Al-12	"As the proposed development parking lot." The original building in 2008 had an occupancy load of up to 881 people and 85 people from the garage*. This building has an occupancy load of? *See email from Lewis, Larry to Stricker, Dan: September 24th, 2008. (Additional documents after the Appendix.		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
AI-13	The current Phase 1/Phase 2 building is more than half the size of 2004 and 2008, so in the absence of other evidence perhaps occupancy is 881/2 for the building, and unknown for the exterior patio areas that seem to be missing from any traffic analysis.		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.
AI-14	Could you please point me to the relevant sections in the San Diego Municipal Code/LJSPDO/L and Development Code where the parking requirements are calculated by the method of half of the size of another building?		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
AI-15	S.4 Why won't the decision-makers assess all of the potential impacts discussed in the EIR? Is the City over defining the areas of potential impact whilst not addressing other areas		the facility be allowed to exceed its maximum under the applicable code.
	that are discussed in the EIR - or omitted? See Page 1-5 of the EIR,	AI-12	The project has been revised and refined since 2008. The current occupancy load pursuant to the San Diego Fire Code is 270 persons.
		AI-13	See responses to comment Al-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.
		AI-14	See response to comment Al-7a.
		AI-15	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.
	7		Thus, the decision-makers (in this case, the City Council), will determine whether the entire EIR is adequate, and if the project

AI-15 (cont.)
Al-15 (cont.) 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.

		T 41 40	51 00 111 11 51D 1 11000 1 11 111 111 111
AI-16	Figure 2.2 A section to the west of Torrey Pines Road is identified as "Park" with a broken line boundary surrounding it. I believe that identifies Allen Field, a privately leased soccer field that is not open to public use, except for occasional use during games for children whose siblings pay to participate in the league games. My son would be turned away from the field unless he was participating in practices/games for La Jolla Youth Soccer. Please ascertain that the boundary is to scale. There has been misunderstanding in the	AI-16 AI-17	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. The project site includes the Cliffridge property and the vacant site, referred to as Site 653 by the commenter. The "past grading
	past with reference to La Jolla "parkland" - therefore it is important for the decision-makers to have the facts at hand. 2.3.1 Landcover		activities" is meant to refer to the vacant site, while the "residential development" is intended to refer to the Cliffridge property.
Al-17	"The project site has been previously disturbed as a result of past grading activities and residential development" Site 653 has never been previously developed. It was Pueblo Land, and then open-space, prior to its re-designation in the 1995 La Community Plan.		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.
Al-18	2.5.3 Does this 33,000 square foot parcel have four land use designations? 3.3 – 3.3.2	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
AI-19	Please spell out every single discretionary action that is required. There seems to be a lot of glossed over issues encapsulated in this section. The diagrams and plans are not always clearly marked, and it is very difficult to determine boundaries, etc., let alone calculate square footage/linear footage.		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."
AI-20	3.3.1.3 What differences to the existing sidewalk would be provided? There are already sidewalks?		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.
Al-21a	"Under this option, the Cliffridge property would be converted to the permanent office and administrative use for Hillel. This would involve bringing the Cliffridge property up to all applicable code requirements for the intended use and occupancy and would include demolishing the existing attached garage, patio, and a tree in order to construct a paved surface parking lot,"	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.
	There isn't any applicable Code for this use. To be very clear, the City of San Diego has a responsibility to act to end the use of this property as a non-conforming use. When the City erred and allowed the applicants to "bundle" the project with Phase 2 (initially		The plans and diagrams provide detailed illustration. With respect to the specific questions in this comment, note the following:
	Project #6098, then Project #149437, now Project #212995), it was supposedly with the express intention of the "House" being returned to residential use. The City of San Diego has not produced any documentary evidence for those who have participated in the numerous public hearings since 2003 when the La Jolla Shores		 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
	8		would total 33,541 square feet.

AI-20	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: 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.
Al-21a	See response to comment AI7b.
	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.

		Al-21b	See responses to comments AI-3 and AI-6e.
AI-21b AI-21c	Association sent a letter to the City, Mayor Richard Murphy, and Council member Scott Peters to note its objection to the violation of the LJSPDO. For a decade, the City of San Diego deferred full analysis of the environmental impacts of this use, including those references earlier that intimate "spot zoning" and the preferences implicit in its	Al-21c	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
	application. Deferral of mitigation has continued in spite of repeated letters, oral commentary and Project related comments that are specific to CEQA. If the record is		Reporting Program.
Al-21d	reviewed, the La Jolla Community Planning Association has also taken a position on the "House" via action items voting at the hearings for the three projects, and in written documents. The LJCPA has never rescinded its clear position regarding the code violations of the "House" therefore taken in combination with the 2003 letter from the La	Al-21d	The comment provides background information on the voting patterns of the. No further response is required.
	Jolla Shores Association, as well as residents' email/telephone and USPS letters, the Code Violation Case should still be open – after 10 years.	AI-22	See response to comment AI-3.
41.00	3.4.2.1		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.
AI-22	The listed uses are not compatible with the applicable codes. a. Operations		With respect to possible alternative locations for the project site, see EIR Section 9.1.
	A student center is not a conforming use. UCSD has the facilities on campus that accommodate the listed activities. Further, the appropriate planning area for a structure -	Al-23a	See response to comment AI-21c.
	permanent/shared/rented - would be in the University Community Planning Area adjacent to campus at the east side. Please note that the administrative record contains the comments proffered by Mrs. Linda Colley, former chair of the UCPG, in the May 2006		A CUP would not be required as the project would be an allowable use within the LJSPDO.
Al-23a Al-23b	council hearing for Project 6098 re: that specifically reference the planning area for these uses. Deferred Mitigation: This document does not contain any factual information to enable comments that specifically address the environmental impacts of the multiple uses of the		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
Al-23c	facility. Traffic, noise, and impacts on pedestrians of increased vehicular traffic, the impacts cannot be assessed because "numbers" aren't provided. Mayors Golding and		detailed therein. See also the response to comment Al-22.
	Murphy assured the residents (skeptical) that a Conditional Use Permit would be required, but there isn't one. Since the LJSPDO doesn't permit a student social facility the CUP issue is moot!	Al-23b	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
Al-23d	Evening activities are not acceptable in a Single Family Residential neighborhood, but there is adequate space at UCSD that would not have any additional environmental impacts associated with it. Or, the students could take the UCSD shuttle to the adjacent		would occur and noise impacts would be reduced to less than significant through the implementation of mitigation measures.
	Jewish Community Center located in University City. The only activities that UCSD cannot support are Religious Buildings of a Permanent Nature. (To paraphrase a long document!) However, several Jewish religious buildings that also provide social activities, teaching, and Bar and Bat Mitzvah preparation are in operation in La Jolla and University City. The UCPG committee has offered on several occasions for Hillel of San Diego to meet with it, as the official planning group for the affiliated uses of UCSD to	AI-23c	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.
	explore options.	Al-23d	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.
			With respect to locating the facility elsewhere, see EIR Section 9.1.

Al-24 Al-25	f. It is completely unclear as to whether or not the landscaping square footage is provided in addition to that around the parking lot, the inner courtyards, etc., or is contingent upon the proposed (and community planning groups denied) two feet narrowing of the street and the vacation of the ROW at the cul-de-sac. There is a lot of conceptual material that is clear - it looks like a large, institutional facility – but the Figures offer more questions than answers. If Site 653 is approx. 33,000 square feet, the area for landscaping based on the current site alone, does not compute. There is not "open space" but a lot of pathways, etc., with trees and vegetation interspersed. It is oriented towards the facility, so not public. The proposed project will remove public space in favor of a private, exclusive use,	AI-24	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.
Al-26a	regional student center and office building in a single family residential neighborhood that once depended upon the buffer of Site 653 between it and the institutional uses of UCSD. 3.4.2.1 i. "Grading would entail approximately 3,450 cubic yards of cut and 300 cubic yards of fill, necessitating the export of 3,150 cubic yards." Please operationalize the above. How many truckloads of excavation are under discussion?	AI-25	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
Al-26b Al-27	What are the projected traffic impacts of staging a construction area in this tightly constrained area? What are the traffic impacts on heavy plant being moved in and out of the area? What are the projected measures to ensure the safety of pedestrians as trucks, heavy plant and multiple construction workers and associated staff work on that tightly constrained site. The curb cuts are not permitted at any point in the plans. There is no access from La Jolla Scenic Way, and deviations have been requested for the additional curb cuts at the "House." (I will address this in more detail in my section on the Traffic Report.)	Al-26a	of the public. 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
	10	AI-27	inbound trucks would access the site per day during the grading period generating 72 daily truck trips." 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

AI-27 (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.

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

AI-28

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 /known 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 Korch

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.)

Al-28 The comment contains background information and expresses questions based on opinions or false assumptions, but 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.

*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 MarketPoint Realty Advisors.

April 27th, 2000: Letter to the representative of the Lutheran Center acknowledging his interest. This is after the LU & 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

La Shores Permit Review Committee, a sub committee of the La Jolla Community Planning Association, June 27th, 2000 La Jolla Community Planning Association, July 6th, 2000 La Jolla Shores Advisory Board, June 20th, 2000

July 19th, 2000: Land Use and Housing Committee meet. Agenda with notations (mine) attached. (Concerns about the LU & H meetings are expressed in detail by Councilmember George Stevens at the November 20th, 2000 City Council hearing.

Note 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 Pueblo Lot Police Decentralization Fund #302481.

Undated: This document accompanied the RFP.

Al-29 My comments

CEQA review should have been initiated at the time of the decision to issue the RFP and change the land use with preference to UCSD affiliated institutions. (Organizations that were, and are still, facilitated in the UCPG.)

Had the City initiated an Environmental Impact Report prior to the decision to initiate the change in use, with the full inclusion of the local community planning groups, the City would have acted in the spirit of CEQA, as addressed by the California Supreme Court in 2007:

"The preparation and circulation of an EIR is more than a set of technical hurdles for agencies and developers to overcome. The EIR's function is to ensure that government officials who decide to build or approve a project do so with the full understanding of the environmental consequences, and, equally important, that the public is assured those consequences have been taken into account."

A Brief History of Site 653 Land Use designation (Docs. Added after the Appendix.)

Al-30 Site 653 was designated open space on January 17th, 1995; City Council Resolution No. R-285228 for all areas outside of the Coastal Zone.

Ordinance No. 0-18168 followed: identifying the OS-P and OS-OSP zones ...

November 8th, 2001: The San Diego Planning Commission unanimously supported the retention of Site 653 as a park, and the community plan in spite of City Staff's "strike out" of the Site 653 planning recommendation (Included). (Note, prior to 1995 the community had, I have been informed, spent countless hours developing the plan and ensuring that it was acceptable to the community as well as conforming with the multiple codes in La Jolla.)

Al-29 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.

Al-30 See the response to comment Al-29. At the time the NOP for the EIR was issued (2010), the project site was designated as low-density residential by the LJSPDO.

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.

AI-30

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.

(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 Inzunza.)

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.

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.

Al-31 Al-32a Al-32b Al-32d Al-334	Please check that in 2004 it was HCJL, and that it was 13,000 square feet. Where is the discussion of the 2008 project, 149437? 3.6.2 Phase 1/Phase 2 Project Changes Please note Item 5. Figures 3-3, 3-4, and 3-8: Please explain how the lot coverage, building structures, courtyards and parking lot in these diagrams conform to the LJSPDO for single family residences? Please identify the single family residences in the project vicinity — Cliffridge Avenue, Nottingham Place, La Jolla Scenic Drive North, Robin Hood Lane that use a 27 vehicle parking lot? Please note Item 6 The elevation of the land area at the corner of La Jolla Village Drive, especially when built upon, will dwarf the residents. The two lines to indicate approximately the location of the unpermitted curb cut make clear the proximity of a tight, narrow driveway into the property. The single family townhomes to the east of the site will unavoidably bear the brunt of such a towering structure. The environmental impacts of the noise, glare, voices, inevitable car noises (beeping alarms come immediately to mind), and so on in a quiet single family neighborhood that does not like street lights have not been considered in this DEIR — as they were not in the MND for 6098 and MND for 149437. 4.1 Land Use Please confirm that the EIR addendum to the La Jolla Community Plan identified the area as 5-9 du acre. In the record it is documented as 1-5 du acre generating 12 — 17 ADTs. Please provide the requisite number of parking spaces that would be required for an approximately 1750 square foot religious building in the LJSPDO — or, the number of spaces that would be required for a commercial building in the LJSPDO — that would be located in the applicable commercial/mixed use areas of UCPG.	AI-32a	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.
	Wouldn't it be 30 per 1,000 sq feet? So 50+ for 1,750 sq. ft approximately? 4.1.4.2 Significance of Impacts	Al-32b	See response to comment AI-27.
AI-35	Please describe how a person responding to this EIR can possibly evaluate the environmental impacts on the site in comparison with those of the 12-17 ADTs per acre	Al-32c	See response to comment AI-32a.
	(and 653 is less than an acre re: generating ADTs) envisioned in the EIR addendum. This DEIR does not contain the specificity of numerical information with respect to traffic, room size, program use and so on, to determine the significance of potential environmental impact. There can be no standard of fair argument in this project.	Al-32d	Noise and glare (including exterior lighting) are adequately analyzed in EIR Sections 4.8 and 4.12, respectively.
	15	AI-33	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).

Al-34 See response to comment Al-7b. Al-35 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 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 definited as the process to be utilized in the flow chart developed by ITE (see Attachment 1). The trip genaration 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 whichilar 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 natalysis revealed that adequate Levels of Service (LOS) are calculated at each of the worst-case scenario nation to significant impacts to the circulation system occur. Attachment 2 shows the intersection analysis revealed.		
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 spit 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 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.	AI-34	See response to comment AI-7b.
	AI-35	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

4.2.3.1

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: QR4-1-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

AI-37

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

Al-38a

Please identify the area that this encompasses because it does not correspond to the quotation below.

16

AI-36 See response to comment AI-35.

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.

Al-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).

In the RECON Report the document states: "RECON conducted three biological surveys of the approximately 0.81 acre Hillet site in the community of La Jolla, San Diego."

Later is stated: "As shown in the aerial photograph flown in April 2007 ,... and undeveloped land to the west,"

AI-38b

CEQA requires that information presented to determine impacts is accurate. The above statement re: 2007 aerial photograph does not reflect the present condition of the land. On the day that the DEIR was recirculated it is more likely that the "vacant" parcel more resembled the photo entered as Item 8. The planning process for the Venter Institute (parcel 4, but first to be developed) was already so far along in the development process that in May, 2007, UCSD was in receipt of a traffic study undertaken by Fehr & Peers for the following project:

"According to the Scripps Upper Mesa Neighborhood Planning Study and University staff, the long term or planned development for Parcels 1-4 will be comprised of 135, 200 square feet of scientific research and development uses."

That is the 1.9/2.2 acre aforementioned parcel of: "... undeveloped land to the west."

(The detailed overview of the first part of the above project was available as early as September, 2006 and included as Item 9. A conceptual overview of the project was available in 1998 (included as Item 10) — prior to the decision by San Diego City Staff to enter into meetings with Hillel of San Diego representatives - and prior to the denials in public meetings that the plan for that area (outside the Coastal Zone) had not been undated and certified.

CEQA review of the change of zoning to accommodate this intense institutional use should have included an analysis of the immediate and cumulative impacts of the UCSD Planning documents.)

Page 4.3.7

Al-39a

"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."

In the prior paragraph both a mature pine and eucalyptus tree are called out as potential for perching.

AI-39b

Then in RECON report dated 11/17/11, it is stated:

"The proposed project would clear the existing vegetation, including the trees on site,"

It may be me who is confused, but is it the removal of one mature tree that has been evaluated in the RECON report for impacts to biological resources – or is it ALL of the trees. I will be very disappointed if ALL of the remaining trees are removed, not least since the removal – without permits and environmental review – of the other mature trees

Al-38b

See response to comment Al-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 Al-39a. Permits are not required for tree removal on personal property within the ROW.

AI-39c	in (September?), 2004 was never rectified by the City. See photo of buildozed tree Item 11. The RECON report calls out the eucalyptus trees east of the site, but 1 don't see any analysis of the cumulative impacts of the tree clearing on the 2.2 acre site to the west of Torrey Pines Road. 4.8	Al-39c Al-40a	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. 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
Al-40a	There are too many assumptions built into the conclusions in this section. As a former resident, I know that construction noise in that area carries because there isn't any substantial natural buffer to block noise. The "beeping" of trucks reversing carries in a quiet residential area. The houses facing the site, and the single-family town homes to the east (they are not multi family homes) will be heavily impacted by noise and dust. This is in addition to the "ignored" cumulative impacts of the construction on Parcels 1-4 on the Scripps Upper Mesa area to the west of UCSD.		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
Al-40b	When this site was analyzed in the EIR addendum as 1-5 du acre (a developer confirmed that no more than three smaller homes could be sited due to slope, access, LJSPDO setbacks, etc.) there was no mention of the type of noise and dirt impacts on a scale required for the Phase 1/Phase 2 project.		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.
		Al-40b	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
	18		one-story buildings, with the two-story section of the facility relating

Al-40b (cont.) 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 construction noise, see response to comment Al-40a.

		Al-41a	The Recirculated EIR (December 2013) clarified this information. As detailed in Section 4.12.1.2:
	4.12 Visual Effects and Neighborhood Character		
Al-41a	"A two-story multi-family condominium and townhome development, built in the mid- 1970s. lies across La Jolla Scenic Way to the east." In 2008, the MND responses prepared by the City included a correction to the above- representation by the City. "As previously stated, we are a neighborhood of attached single-family homes. Our Association operates as a Planned Unit Development (PUD),		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).
	with each owner in outright possession of their own deed and collectively sharing adjacent common areas such as streets, guest parking spaces, trails, and recreational facilities." The comment was provided by the Board of Directors, La Jolla Village Estates. (H-1)	Al-41b	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
Al-41b	As already documented, there isn't: "A large undeveloped lot belonging to UCSD located across Torrey Pines to the west." (When was this E1R written?)		the cumulative project analysis contained within Chapter 7 of the EIR.
Al-41c	The Theater district is .1 mile north of the project site, buffered by a eucalyptus grove.	Al-41c	The UCSD theaters are approximately 350 feet north of the project
Al-41d	"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."		site, as accurately summarized in the EIR.
	The above is <i>slightly misleading</i> . The elevation of that corner already results in a raised area that "looks down" onto the residential area, so the 10 foot slope isn't as benign as it reads. (Item 12 provides a pictorial presentation of the "slope" at the northeast corner. Is it 10 feet?)	Al-41d	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.
AI-42	4.12.12 ? The "House" is not an apartment. There is no conforming use in the LJSPDO for that use as it currently exists, in that neighborhood. "Renaming" it doesn't obscure its unpermitted use.	AI-42	The EIR section referenced by the commenter is excerpted below:
	Site 653 is not zoned for apartments? Please explain/provide the discussion documents how Staff concluded that this was the applicable section of the design manual.		The House This section of the Design Manual does not provide specific guidance for non-residential use. However, the
	4.12.4.1		section contains guidelines for higher-density residential
AI-43	Figure 4.12-3 perfectly illustrates how Site 653 serves as a buffer area between UCSD and the single-family residential area. (Item 13.)		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
	Page 4.12.23		applicable to Phase 1/Phase 2.
AI-44	With all due respect, the inclusion of the La Jolla Playhouse on the UCSD campus, across the 6 lane La Jolla Village Drive in the UCPG planning area, distant from La Jolla Scenic Way, and screened by trees, is an argument "reductio ad absurdum" or more probably a red herring.		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
	19		above. 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

AI-42 (cont.) used for the analysis because it contains guidance for buildings to "better blend in within a single-family residential zone." 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.
Al-43 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.
AI-44 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.

Architectural Style and Building Materials AI-45 A different narrative - based upon the community plan and existing uses: The No Project Alternative which would maintain the site in its AI-45 Perhaps the vacant site could be considered a "natural buffer" from intense institutional current undeveloped state is analyzed in Chapter 9. uses to the north and west; therefore a protective boundary for the single-family townhomes to the east and the single family homes in the area known as La Jolla Highlands ... Potential for Setting Precedent Al-46a See response to comment AI-5c. AI-46 Since Hillel of San Diego is not registered as a student organization, why is it being permitted by the university to serve students as if it is? The UJF in the past has been affiliated officially and served the students. This comment does not raise any substantive issue associated with the adequacy or accuracy of the EIR. No further response is In 2004 this "name" use was brought up with the City - and not addressed appropriately. required. Of course it is setting precedent: An unregistered student serving organization has used a residence for 10 years in violation of Code Compliance. ANY organization purporting to serve UCSD students could claim discriminatory treatment should the City deny a non-compliant use of a property. This is especially clear in the light of Mr. Steele's comments at the Scoping meeting. As past Chair of the both the La Jolla Shores Association and the San Diego Planning Commission his description at the DEIR scoping meeting cannot, nor should not, be ignored. ANY organization denied an illegal shared use parking agreement by UCSD to support off campus activities in any house in the LJSPDO could claim Hillel of San Diego set precedent. The City of San Diego has waffled and wavered on this issue for a decade. Several residents have obtained documents through emails to staff and/or Public Records Requests. I have included copies of some as Item 14 as an example of the inconsistency amongst Staff about the "House" and its use with respect to the LJSPDO and Land Development Code. When there is inconsistency there is distrust.

9.5 Site 675 Alternative 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 programment of the perfect AI-47 AI-47 The Recirculated EIR (December 2013) includes a figure that shows the location of Site 675. the City map records the location as that of 653.)

Traffic Report TRAFFIC IMPACT ANALYSIS UCSD HILLEL CENTER FOR JEWISH LIFE La Jolla, California January 11th, 2012

Al-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 predating 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:

- "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.
- There is no specific analysis in the DEIR of the "... approximately 60AM peak hour, 50PM peak hour, and 360 daily trips estimated as 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 90,000 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.

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Al-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.

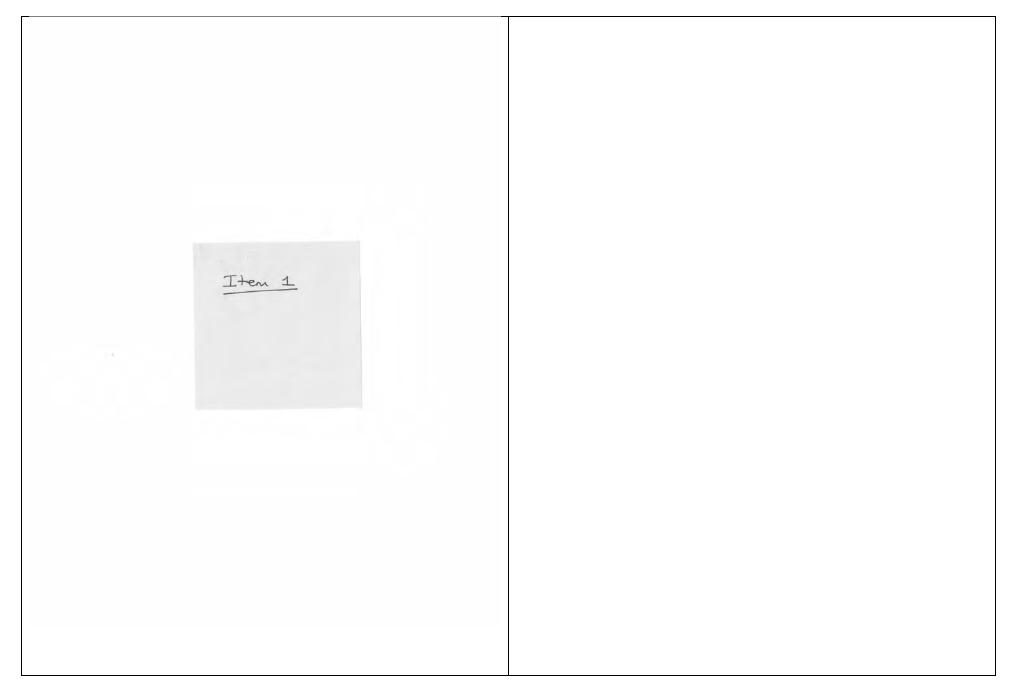
The cumulative traffic analysis (see Section 4.2.3.2(a), specifically Figures 4.2-8 and 4.2.9 and Tables 4.2-9 and 4.2-10) demonstrate the distribution of cumulative traffic and effects on segment and intersection operations with and without the Phase 1/Phase 2 project. Based on this modeling input, 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
LICO by the proble of locate to the Verter leather to the FID
UCSD-owned parcels adjacent to the Venter Institute when the EIR
was released. However, the traffic volumes from the potential
huildout of the LICCD compute (including years) are included
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
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.
within the Traine impact, that you propared as part of the Ent.

AI-49a AI-49b AI-49c AI-49d	The omission of the presently known and projected impacts of Parcels 1-4 have clearly been known to Development Services Staff for a considerable period of time, yet there is no mention of the Scripps Upper Mesa area in the DEIR. The groundbreaking celebration for the Venter Institute (Item 17) was reported as September 20 th , 2011 – 17 months ago. 3.0 Existing Conditions 3.1 Existing Street Networks Page 7 "La Jolla Scenic Way will provide access to the proposed development via a right-in/right out driveway." See the proximity to the two left-hand turn lanes from La Jolla Village Drive at La Jolla Scenic Way. (Item 18.) Please note Items 19 a., and 19.b. 19a. notes that Site 653 should be maintained as a landscaped traffic island. (1977) 19b. Notes objections to the use of the site as a Propose Construction Lay-down Site, including "Displacement of parking for UCSD students." The second objection is telling: Slow vehicles would interfere with adjacent traffic signals." Why has the City decided that in spite of past objections, based upon safety, that some 37 years later, and 17 years later, it would be acceptable to end the no-curb cut prohibition (as well as the no development prohibition)? In 2008 I submitted a detailed request to Mr. Kelly Broughton (fax cover sheet as part of Item 20) to ascertain the decision-making (documented) by City Staff that would provide	AI-49a AI-49b AI-49c AI-49d	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 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 throughout EIR Section 4.2, traffic-related impacts would be less than significant. See response to comment AI-32b.
	explanation of the decision by Staff to continue to support the driveway (with deviations, of course) off La Scenic Way. I received no reply from Mr. Broughton. However, a subsequent public records request indicates that City Staff aren't really sure why it's being allowed. (See documents as Item 20.) 9.0 Near Term Cumulative Projects		
AI-50	Why doesn't the Traffic Report document the cumulative projects in process/planned for the land west of Torrey Pines Road. Page 56	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
AI-51	So that I can understand this table, please explain 7,084 square feet, with 27 parking		can be found in EIR Section 4.3.2.1.
	spaces = 3,7 parking spaces Per KSF.	AI-51	With respect to the number of parking spaces to be provided, see response to comment AI-7b.
	This Table is erroneous. The UCLA and UCSB comparisons have already been discussed. It is the zoning, and the parking requirements that are required by the		response to comment Al-1b.
	23		

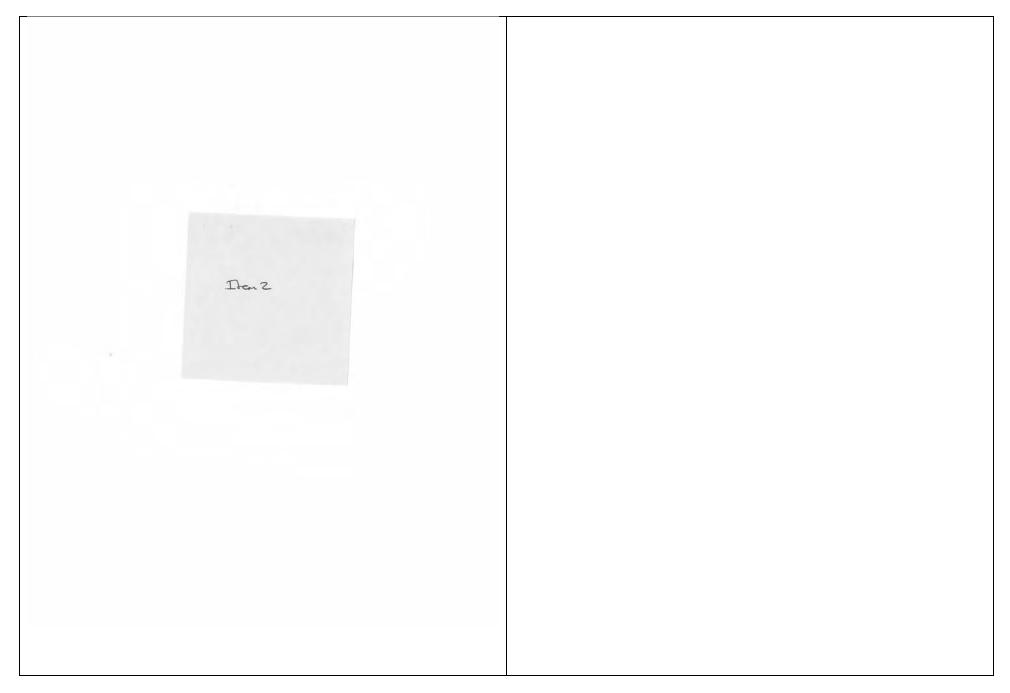
municipality that are relevant. What has Tulane University to do with the La Jolla Shores Planned District Ordinance? Addendum AI-52 Item 21: This graphic illustrates the size of the UCSD campus. Site 653 sits across a busy AI-52 See response to comment AI-35. road quite removed from the primary, walking accessible, locations on the campus. If you review the "Will They Walk" presentation to the Planning Commission prior to the Project 6098 hearing (Jim Moore), you will note the contradictions in the statement that students will walk, and that Site 653 is the only location where Hillel of San Diego can construct a student center. AI-53 With respect to the narrowing of La Jolla Scenic Drive North, the AI-53 The impacts on the residents of the removal of the STOP at Cliffridge Avenue cannot be proposed reduction in width of La Jolla Scenic Drive detailed in EIR overestimated. Gary Halbert walked the site many years ago before he left San Diego Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as a Development Services, and he couldn't understand why the sign would removed. There is no visibility at that corner. On occasions, when walking my dogs/kids/riding my bike Local Street in the La Jolla Community Plan. Per the City's Street there would be a close call at the corner - with the STOP when a rushing driver just Design Manual, Residential Local Streets are typically to provide a didn't acknowledge the sign. Traffic will speed up to take advantage of the flow - as curb-to-curb width of at least 32 feet (with on-street parallel parking). happens - and there will be a conflict. Families, especially those with young children who are heading off to explore campus on their bikes, or head down to the canyon with La Jolla Scenic Drive North along the project frontage is currently 36 the family dogs as well should not be exposed to institutional encroachment in an area feet from curb to curb. Thus, the reduction of the roadway width from that is not designed for such pressure. For those who are elderly, the risks are inherently 36 feet to 34 feet is considered adequate for the street classification. increased when there is an increase of vehicles, speed and slowing down of faculties. The reconfiguration of La Jolla Scenic Drive North would be AI-54 designed to City standards. As such, the Phase 1/Phase 2 project Another impact that has not been adequately discussed in this section involves the proposed driveway from La Jolla Scenic Way and the interaction with pedestrians. That would result in a less than significant impact. street area is so busy as students and staff park in the neighborhood and head to UCSD using a variety of routes. Walking, using skateboards, riding a bike on the sidewalk will be hazardous if the City really permits a driveway at that location. Additionally, the traffic study shows that only 1 percent (2 trips per There are many reasons why past planners didn't permit building on that site, and why it day) would be added to La Jolla Scenic Drive North by the project. was used for mitigation in 1982 for increased density. It is not suitable. It was called out Therefore, no significant impact would result. for special treatment in the 1989 UCSD EIR because of concerns that the corner at Torrey Pines Road would need, in the future to be reconfigured - or to provide a pedestrian bridge. AI-54 See responses to comments AI-27 and AI-53. Mr. Joe Dicks described the risks to both users of the site and others, during testimony at the May, 2006 hearing - but none of that has been considered in this DEIR even as a possible significant impact. As Item 22 please find photographs taken in 2004 - before the most recent expansion at UCSD to understand the conditions in that area. And then look at the plans for Parcels 1-4 west of Torrey Pines Road, described in 2008 by Lesley Henegar (Item 23) as "It is owned by UCSD and so they will do with it as they see fit." and consider the impacts that have not even been considered by this DEIR.

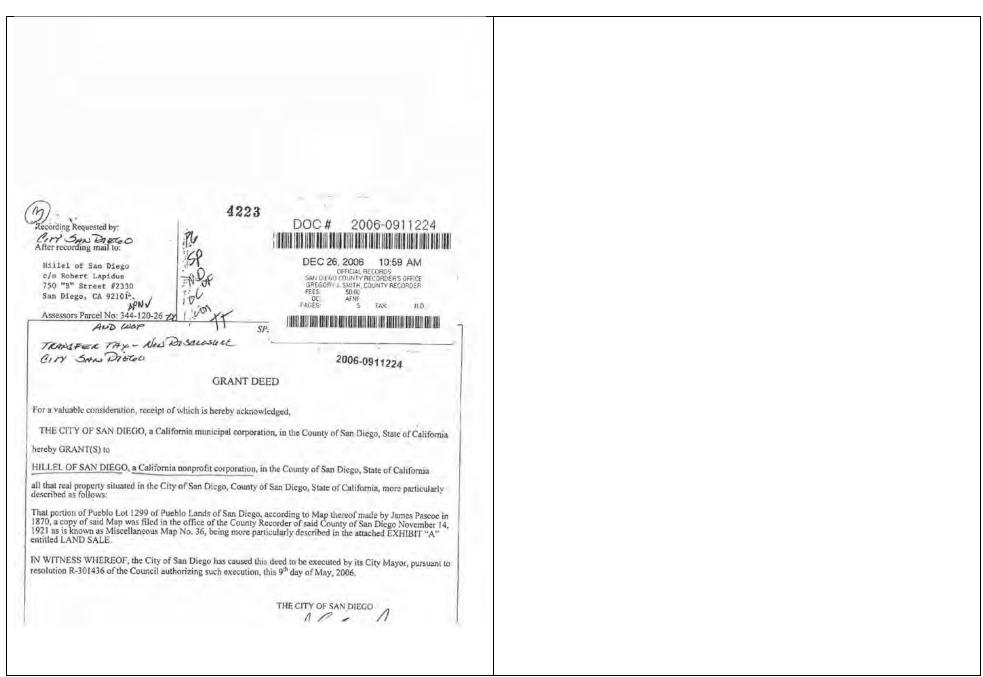


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			1111111111	6.4
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		HILLE	L OF SAN DIEGO	\$
CA	LIFORNIA, a	istate Development after 	ant") is made and entered into this (date to be filled both parties have eigned) day day even THE REGENTS OF THE UNIVERSITY of "Licensor", on behalf of the San Diega Campi alifornia non profit corporation ("Licensee").	01 7 6
			RECITALS	23.
fac	WHEREA	S, Licensor is the owner UCSD; and	of real property consisting of various parking le	10 TO TO
required Lice	rei Center") to Village Drive lested permise CSO (the "Pre nsee's use du	o serve the Jewish studes, and in connection with ight for itself, its guests, a emises"), to be designated ring Friday night Shabbal up to 12 times per year	with the development of a permanent Hillel Center to the UCSD to be located adjacent to UCSD on List development and use of the Hillel Center hand employees to use parking facilities in a parking to in accordance with the terms of this Agreement, to Services ("Shabbat Services") and for special even ("Special Events") while UCSD is in session, a	1 7 7 P
sel F	WHEREAS	S, Licensor desires to gran	t such permission under the terms and conditions as	2 4 2
		EREFORE, the parties agr	re as follows:	W 7 36
t	License (b) from the Pr a maximur and employ vehicles ow providing for Hitel Cente from 5 p.m. Special Eve requested of perein Pro-	antar upon and use the a remises, subject to the ter of sixty seven (67) page year (or Shabbal Service year (or Shabbal Service year) by Licensee's invitee or pick-up/drop of sides it or pick-up/drop of sides it or ("Licensee"). The hours until 12:00 p.m. for the pants shall be subject to the date and time of use, in ovided, however, the use	censee, its agents and contractors, a non-exclusive promises and the right of ingress and agress to and ms and conditions herein, for the purpose of parking inger vehicles owned by Licensee's invitibles, guests is and a maximum of seventy five (75) passenger is, quests and amployees for Special Events and for or shuttle services between the Premisee and the of use permitted in this License shall be each Friday urpose of Shatbat Services. The hours of use for prior designation and approval by License free sech accordance with the notice procedures set forth of the Premises will be subject to evallability for adding LICSD's normal academic or work week.	مده المحمد المح
2	Premises.			8 1
	designated in Ligansor's respectively a parking local use of one of Lots is depitational availability to change over	by Licensor from time to the easonable discretion, with it in closest proximity to the isbility during the date and of the following Lots P604 toted on Exhibit A attach differsee acknowledge to a meet Licensee's need if time and another loca if time and another loca	ity to be used as the Premises hereunder shall be me during the term of this License in the exercise of the intent that Licenser shall reasonably designate a Hillel Center that is anticipated to have sufficient litme of the Licensed use. Licensee has requested or P808 for Shabbat Services. The location of these at hareto and incorporated herein by reference, nat these facilities currently have adequate parking for Shabbat Services; however, availability may tion for the designated Premises may be more as one of the above referenced Lots for Shabbat	Special to head ?
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	Sea	Wises use.	subject to Licensor	r Plater to declarate waster to			
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	pertif after pertig 2012 may	completion d of five (5) However, be renewed	upancy (and License of the Hillel Center () years, and shall of after the expiration with the written muti	eement shall commence on the date of issuance of a re-shall provide Liceanor with written notice thereof) expected between Fall 2005 and Bpring 2007) for a spire no lefer than the close of Spring semester in of the initial term of this Agreement, his Agreement is agreement of Liceanor and Liceanor.			
	Premoty Like not a parkin then admired to the second to th	less used possessor as apurently on a ng tales or pin effect. In affect, the layer after the	y Licensee hereund pplicable to the time rge for public parkit policies are changed in addition, Licensor for implementing the completion of the completion of the	Licensor a fee for each parking space on the or at the deliy or sevening parking rate then in effect and date of the event. For instance, Licensor does g at the University for weekend use. However, if in the future, Licensee shall pay the applicable rate may charge Licensee a standard and outstomary its Agreement. All payments shall be made within Licensed use and shall be submitted and made sity of California and remitted to:			
	Trans Univer	or, Operation & i portation & i raity of Cald Gilman Drive la, CA 9209	Perking Services, 00 ornia, San Diego e	40			
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			and expense, appropriate signage as desired, for ills see agrees to place such signage on the Premises no event and will remove such signage at the conclusion			
1		understood by both parties	de a security guard(s) on sile to oversee Premises and of the licensed use at its sole cost and expense. It is that the Licensor assumes no responsibility for stolen on the Premises during the term of this Agraement.			
		than the Premises, except location, Licensee acknowle	mable steps to advise its employees, invitees and fer this Agreement should occur on UCSD land other pursuant to a valid parking permit approved for such edges that Licensor will cite violators who park on or may, in its election, tow offending vehicles, of the warranted.			
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V.,		
ACKNOWLEDGMENT		
State of California County of San Dieco		
On 12/18/06 before me, DAWN CHARLES MARTENS, NOTIARY (here insert name and title of the officer)	VBUC.	
personally appeared		
personally known to me (or proved to me on the basis of satisfactory evidence) to be	1	
the person(s) whose name(s) slare subscribed to the within instrument and acknowledged to me that he) shadhey executed the same in his/her/their authorized		
capacity(ice), and that by higher/their signature(if) on the instrument the person(if),		
or the entity upon behalf of which the person(s) acted, executed the instrument.		
WITNESS my hand and official seal. DAVID CHARLES MAR	Five	
WITNESS my hand and official seal. DAVID CHARLES MAR COMM. #1589 Signature	9 C S C S C S C S C S C S C S C S C S C	
NOVEMBER 22, 2	9	
(Seal)		

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EXHIBIT "A"

THAT PORTION OF PUEBLO LOT 1299 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 1870, 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:

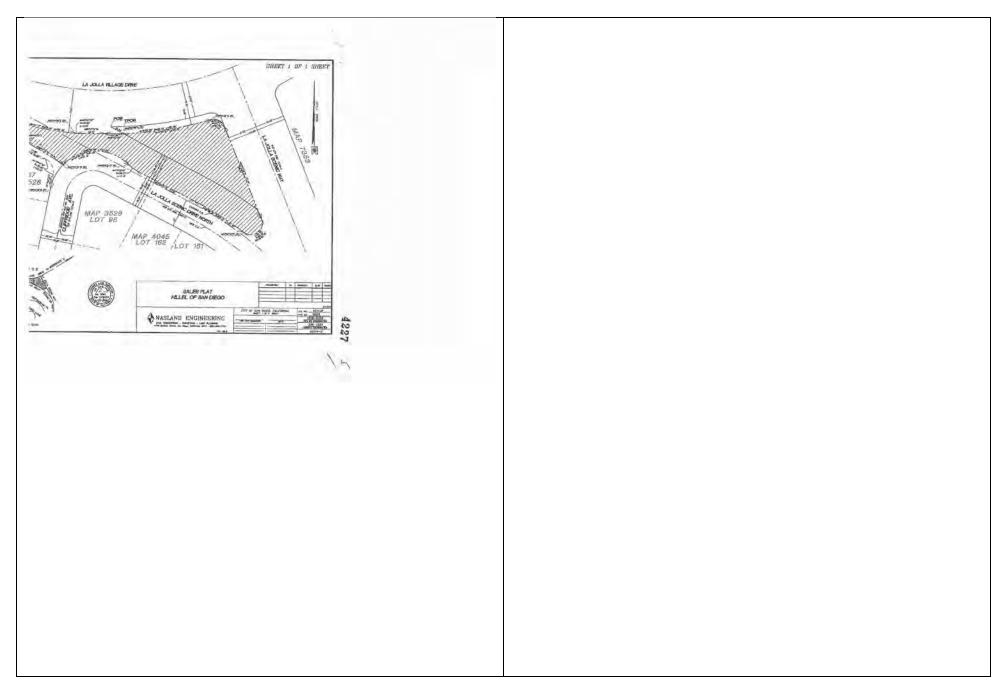
BEGINNING AT A POINT ON THE NORTHERLY RIGHT OF WAY LINE OF LA JOLLA SCENIC DRIVE NORTH, DEDICATED FOR STREET PURPOSES BY RESOLUTION 150337, RECORDED OCTOBER 3, 1958 DOCUMENT NO. 163406 OF OFFICIAL RECORDS, ALSO BEING A POINT ON THE SOUTHERLY RIGHT OF WAY OF LA JOLLA VILLAGE DRIVE (FORMALLY MIRAMAR ROAD) AS DEDICATED FOR STREET PURPOSES BY RESOLUTION NO. 186827 RECORDED APRIL 5, 1966 DOCUMENT NO. 56775 OF OFFICIAL RECORDS; THENCE SOUTHEAST ALONG SAID NORTHERLY RIGHT OF WAY SOUTH 62 "35"54" 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°20'59" EAST, AND ALSO CONCENTRIC WITH AND 12.00 FEET SOUTHERLY 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°00'07", AN ARC DISTANCE OF 155.09 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. 186827 RECORDED APRIL 5, 1966 DOCUMENT NO. 56775 OF OFFICIAL RECORDS; THENCE ALONG SAID RIGHT OF WAY SOUTH 21°57'52" EAST, 173.49 FEET TO THE BEGINNING OF A TANGENT 20.00 RADIUS CURVE, CONCAVE NORTHWESTERLY: THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 149°01'24". AN ARC DISTANCE OF \$2.02 FEET TO THE BEGINNING OF A REVERSE CURVE, CONCAVE SOUTHWESTERLY, HAVING A RADIUS OF 605.00 FEET, A

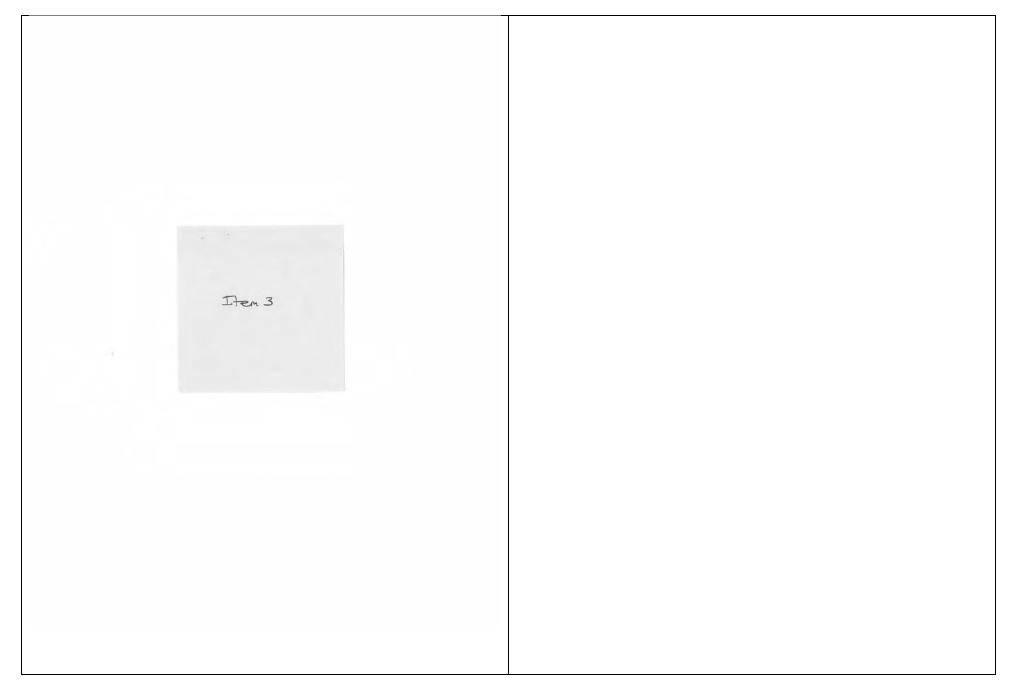
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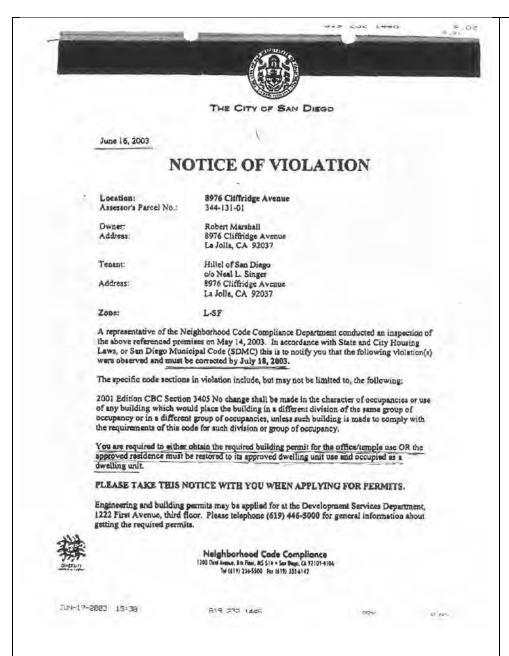
THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 89°52'48", AN ARC DISTANCE OF 127.06 FEET; THENCE NON TANGENT TO SAID CURVE NORTH 58°31'31" WEST, 72.74 FEET; THENCE SOUTH 58°40'55" WEST, 13.12 FEET; THENCE NORTH 62°35'54" WEST, 10.84 FEET TO THE BEGINNING OF A TANGENT 20.00 FOOT RADIUS CURVE, CONCAVE SOUTHEAST; THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 106°17'34", AN ARC DISTANCE OF 37,10 FEET TO A POINT OF CUSP; THENCE NORTH 11°06'32" 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 93°19'50", AN ARC DISTANCE OF 32.58 FEET TO THE BEGINNING OF A REVERSE 636.64 FOOT RADIUS CURVE, CONCAVE NORTHERLY, A RADIAL TO SAID POINT BEARS SOUTH 14°26'22" WEST. THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 09°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 05°14'05" WEST; THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 04°42'02", AN ARC DISTANCE OF 3.45 FEET: THENCE SOUTH 89°27'57" EAST, 48.73 FEET TO THE BEGINNING OF A TANGENT 634.64 FOOT RADIUS CURVE, CONCAVE NORTHERLY: THENCE ALONG THE ARC OF SAID CURVE THROUGH A CENTRAL ANGLE OF 02°53'02", AN ARC DISTANCE OF 31.94 FEET TO THE TRUE POINT OF BEGINNING

AREA: 33,567 SQ.FT 0.771 ACRES MORE OR LESS









July 2003 – From Hillel of San Diego, Jewish Campus Centers, 5742 Montezuma Road, San Diego, CA 92115



A publication of Hillel of San Diego

San Diego State University • University of California, San Diego San Diego Community Colleges • Local Universities

HILLEL AT UCSD HAS A TEMPORARY HOME

In an extraordinary gift of generosity and creativity, the Potiker Family Foundation has purchased a home across the street from UCSD and offered Hillel of San Diego the use of the house as an interim 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 Goldstein. 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 establishers of the Potiker Family Foundation. Their son and daughter-in-law, Lowell and Julie Potiker, saw how Hillel could benefit from the use of the house and oversaw 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 Neal Singer 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 Goldstein, Oulgoing President Bob Lapidus, Lowell Potiker, and Shella Potiker at Hillel's Annual Meeting



DOOD *Cal Issent! Formation

Rabbi Lisa Goldstein Executive/UCSD Director 858-550-1792

JACKIE TOLLEY SDSU Director 619-583-6080

BARBARA HIRSCHORN Development Associate 856-550-1798

Wes Sites: http://ujs.ucsd.edu www.ronan.sdsu.edu/~jsu



A Beneficiary of the United a with Federation of San Diego County





HILLEL OF SAN DIEGO 8976 CLIFFRIDGE AVENUE LA JOLLA, CA 92037 858-550-1792 Fax 858-550-1794

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February 27, 2004

City of San Diego Development Services 1222 First Avenue, MS-301 San Diego, CA 92101-4154 Attention: Robert Korch, Project Manager

Re: Merger of Applications for 8976 Cliffridge Avenue, La Jolla (Site Development Permit) Project No. 20140 (" House" or "8976 Cliffridge") and for Site 653, La Jolla, CA (Street Vacation, Planned Development Permit, La Jolla Shores Development Permit, Easement Abandonment) Project No. 6098 ("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 Cliffridge 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 8976 Cliffridge parking alternative and have received further clarification on the shared parking

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 A2.0, and involves the construction of a temporary sidewalk and parking improvements with in 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 <u>not</u> 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 reserve 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 Cliffridge as depicted on Sheet A2.1, submitted herewith. We would propose that this alternative be required only if the Size 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 plan 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 Cliffridge and the Hillel Center projects (with abandonment of right of way) are approved, we contemplate a three phased project. Phase I 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 Hillel Center as per plans, excluding the permanent improvements to be constructed in the abandoned cul-de-sac. After obtaining a certificate of occupancy for the Hillel Center, we will vacate the House and finish the site improvements to the abandoned cul-de-sac as shown in the Site 653 Project application.

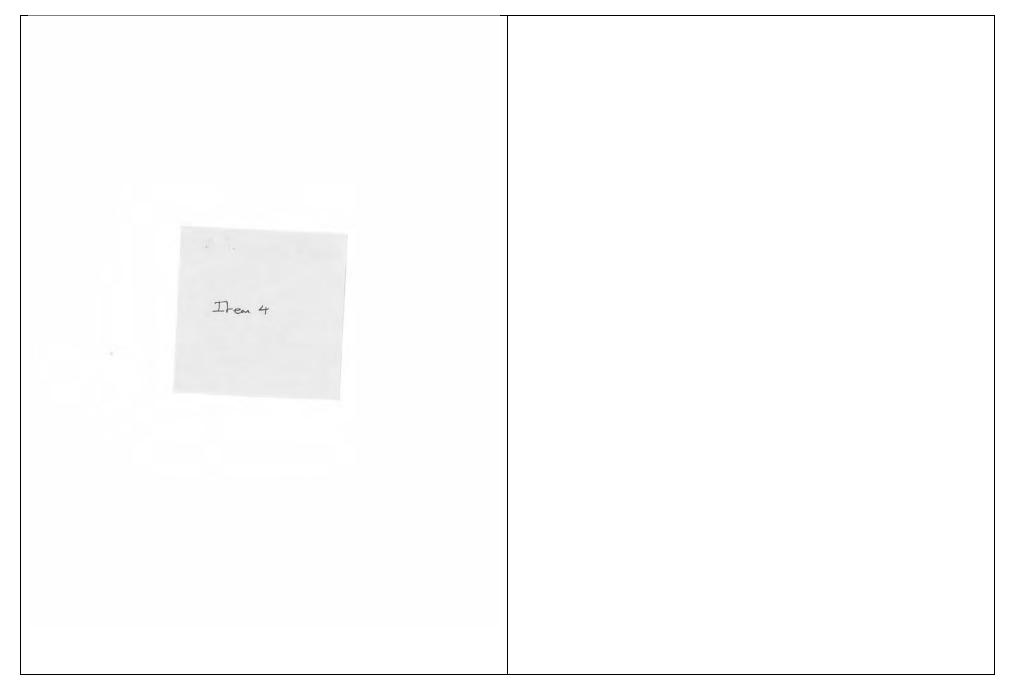
If you require any additional information concerning this application, please feel free to contact me at 619-338-4932.

Sincerely,

Robert Lapidus

Immediate Past President Chair Facilities Committee

Hillel of San Diego





SOLOMON WARD SEIDENWURM & SMITH, LLP

SECULIARIE DE DESCRIPTOR

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ENAIL hademon@avaslaw.com DIRECTUNE (619) 238-4810

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WILLIAM C. WARD, IN HET !

CALVES CARROL

CANALITY TO THE TANK THE TANK

ATTORNEYS AT LAW

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.

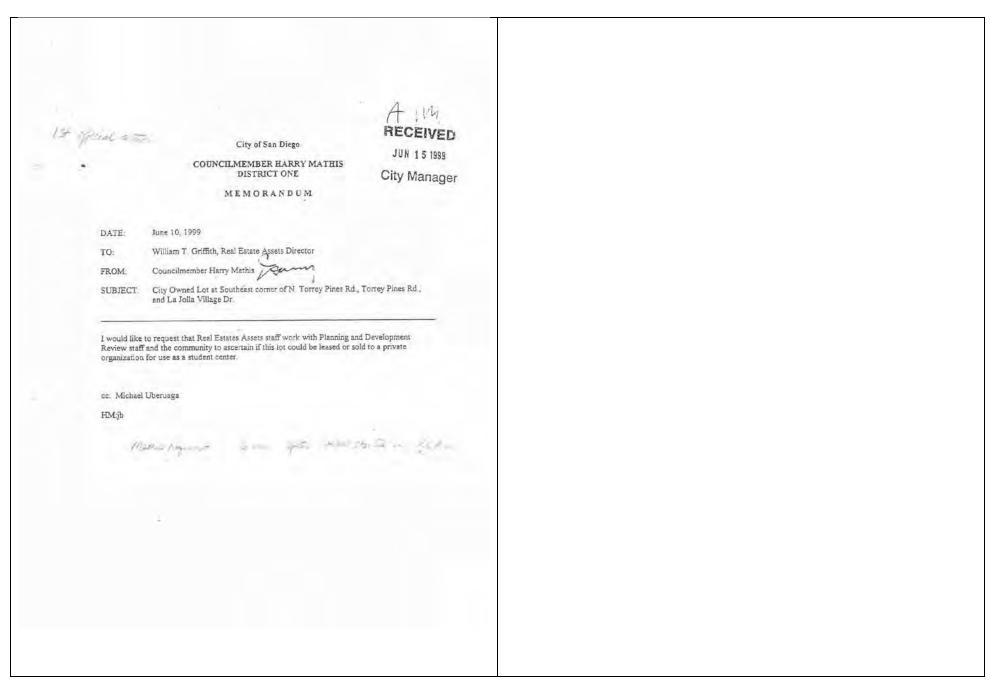
We have identified a vacant property south of the Mandell Weiss Theater owned by the City, designated as Parcel 26 on San Diego County Assessor's Map, Book 344, Page 12. It appears to be a leftover triangular parcel remaining from the installation of the three roadways which surround it: La Jolla Village 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.

CITY OF STATEMENT OF STATEMENT

401 B Street, Suite 1200 San Diego, California 92101 Telephone (619) 231-0303 Facsimile (619) 231-4765

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unou	
Ms. Lucille Goodman	
January 27, 1999 Page 2	
Page 2	
Company of the Compan	
Mr. Singer and I look forward to meeting with you on February 8th.	
Sincerely,	
A LHSolmon	
Herbert J. Sologian	
HIS/da	
HJS/da cc: Mr. John Barlow, Council Representative Mr. Neal Singer P-0115940-01-99008-023	
Mr. Neal Singer P-0115940-01-99008-023	



CITY OF SAN DIEGO MEMORANDUM

DATE

July 16, 1999

TO:

Councilmember Harry Mathis

FROM:

William T. Griffith, Real Estate Assets Director

SUBJECT: AIM #99-0444 Response - City Parcel at La Jolla Scenic Drive

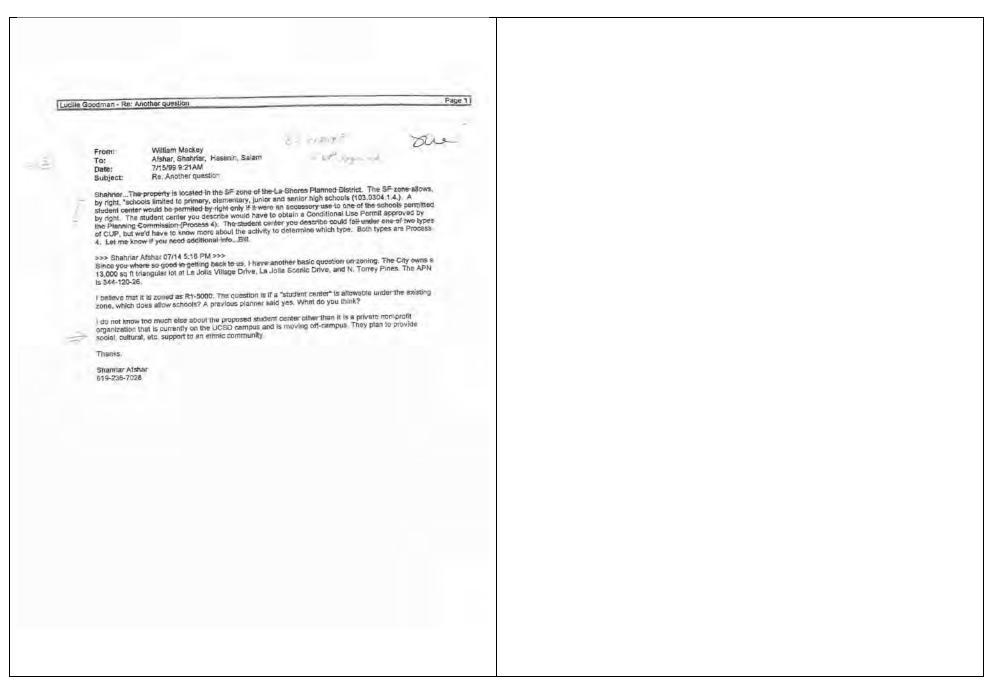
See mint P1068

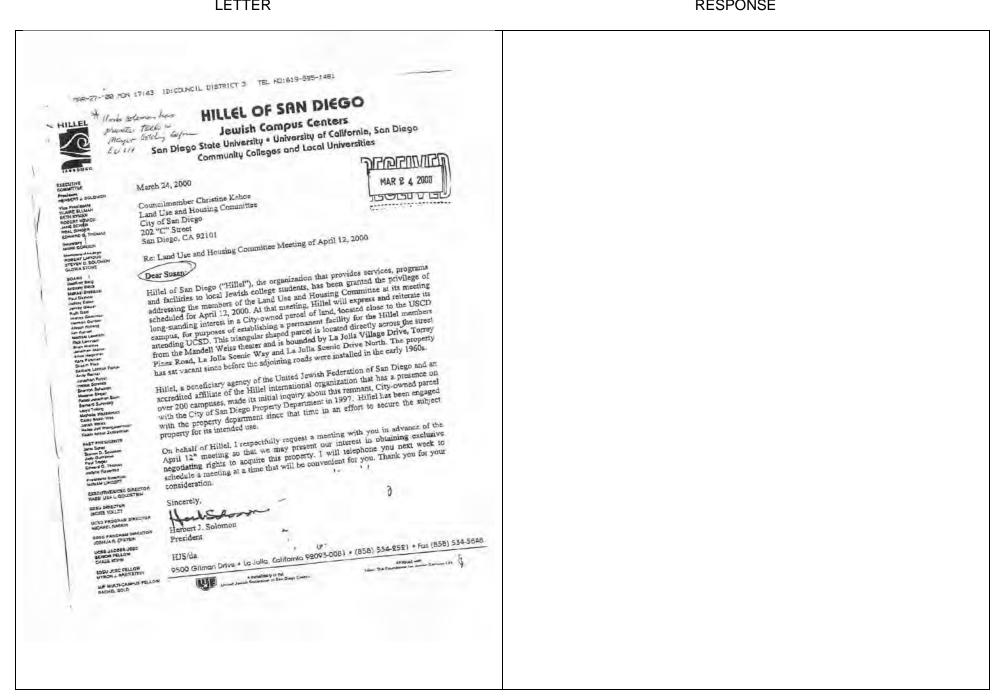
Real Estate Assets staff has been advised that a student center use is consistent with the prevailing zoning of the City parcel, which is Single Family Housing. Additionally, the Transportation Division has Informed us that the future road work on La Jolla Village Drive will not materially impact the City parcel. However, there may be some minor curb, gutter, and sidewalk improvements necessary along ta 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. be developed.

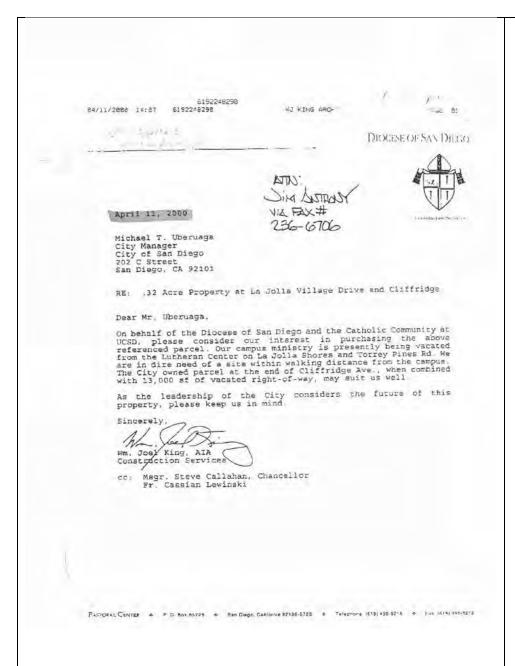
For further questions on this matter, please contact Lucille Goodman, Asset Marketing Supervisor at Ext. 66720,

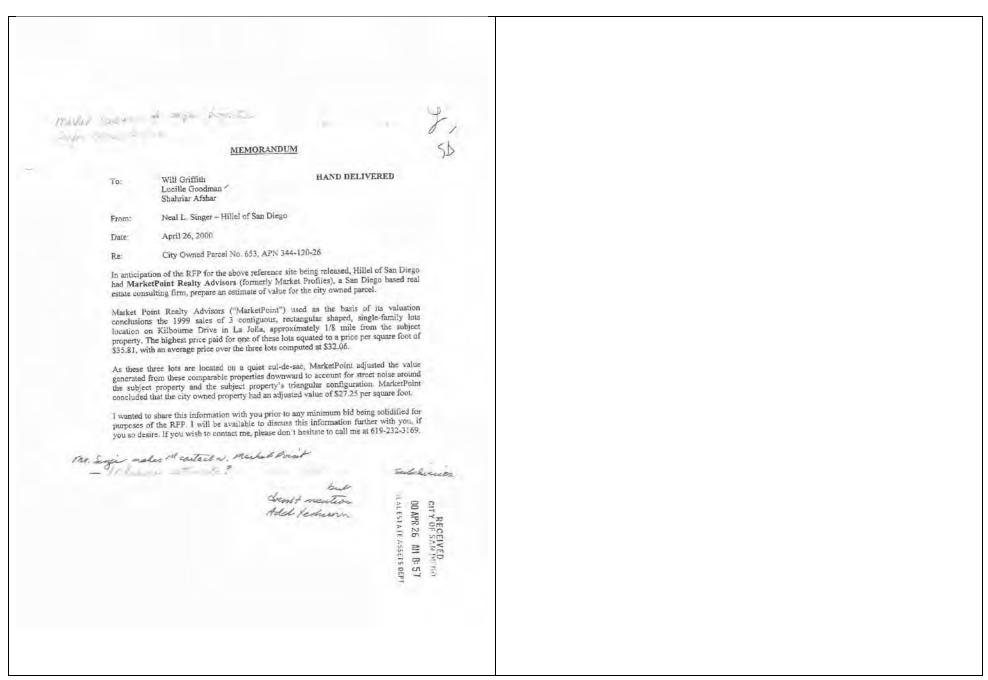
WILLIAM T. GRIFFITH

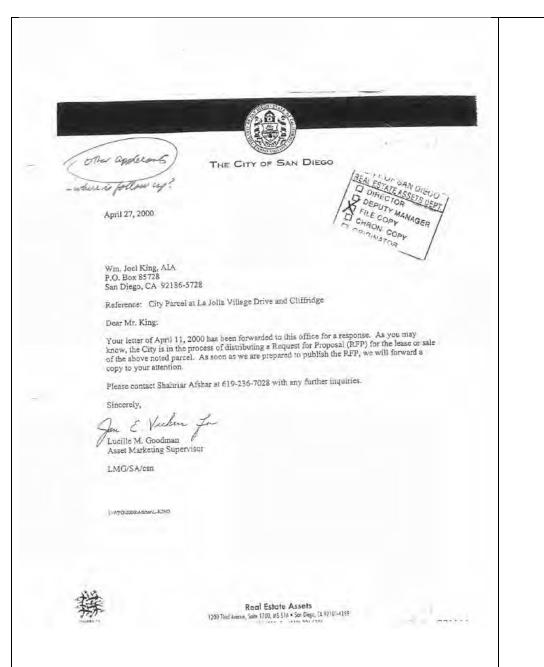
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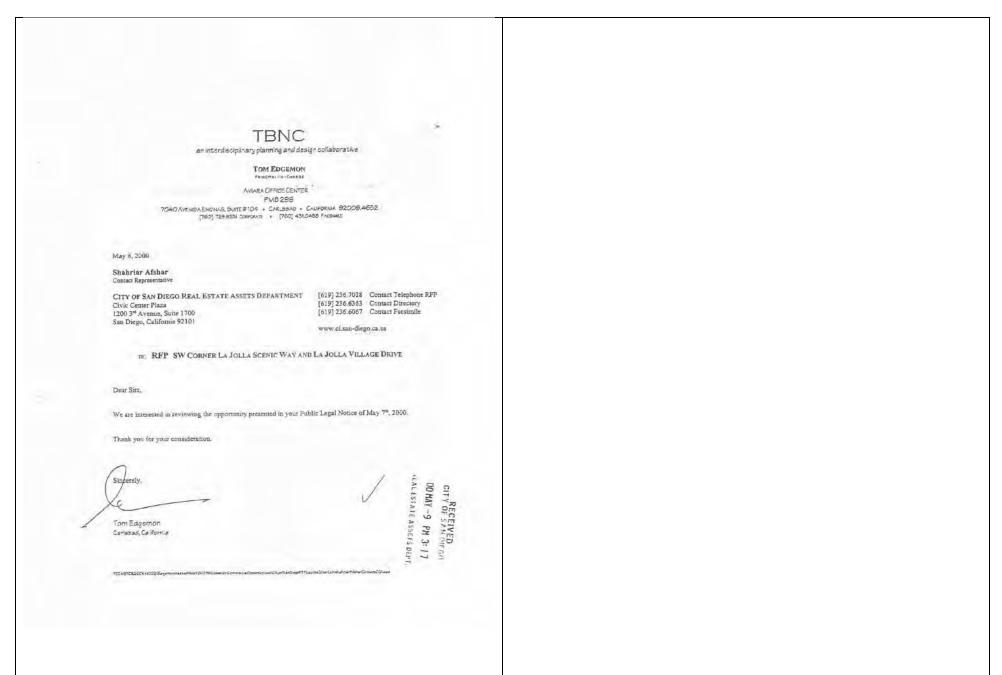






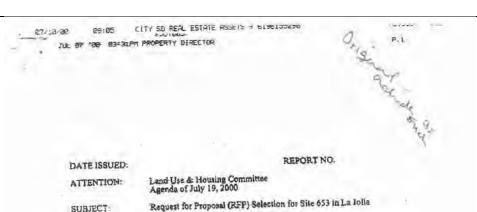






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SUBJECT: SUMMARY

Listic - Should the City Manager enter into exclusive negotiations for the ground lease of Site 653 at La Jolla Scenic Drive North with Hillet 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

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 Pueblo Lot Police Decentralization Pund #302481.

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 15,341 square feet and may encompass a larger area of an additional 17,923 square feet if a partial paper street is vacated at La Jolla Scenic Drive North, for a total of 33,264 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 organizations based at UCSD.

DISCUSSION

Staff advertised the RFF and received two responses by the June 5th deadline. The two responses were from Hillet of San Diego to develop and operate a facility serving the UCSD lewish student community and the La Jolla Highlands Homeowners to maintain an undeveloped landscaped area. A four member at hos committee made up of two City staff and two members and scaped area. A four member at hos committee made up of two City staff and two members for the La Jolla community voted three to one in favor of extering into negotiations with Hillet of San Diego. The at hoc committee recommended that the City consider the current and proposed fand use designations of the site in its decision to enter into ground lease negotiations.

ETX:0/00 ES:05 CITY SD REAL ESTATE ASSETS > 6136156290

NO.038 P03

P. 2

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 1976 La Jolla Shores Precise 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 1985 La Jolla Shores Local Coastal Program 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 Park and Recreation Department, this site is not suitable for open space uses or inclusion in any open space condors. The site is currently zoned for single family use. A Conditional Use Permit (CUP) would be required for the use proposed by Hillel.

Hillel of San Diego provides educational resources, religious services, programming and facilities to the local lewish college community, with an existing on campus presence locally at San Diego State University. Nationally, the Hillel 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 aits through the RFF 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. Hillef will be required to complete this discretionary process as a condition, prior to consummation of the ground lease.

ALTERNATIVES

- Recommend the formation of a privately funded financing vehicle similar to a landscape maintenance district to landscape and maintain the site as undeveloped.
- Recommend reissuance of an RFP limiting the use to single family residence.

Respectfully submitted,

William T. Griffith
Real Estate Assets Director

Approved: George I. Loveland
Assistant City Manager

WTG/SA/jmj-d

-2-

Undaked doc.

THE CITY OF SAN DIEGO REQUEST FOR PROPOSALS LA JOLLA SCENIC DRIVE NORTH AND LA JOLLA SCENIC WAY

A. PROPERTY DESCRIPTION

- Location: Northwest comer of La Jolla Scenic Drive North and La Jolla Scenic Way, identified by the City as Site 653.
- Legal: Portion of Lot 1299, Misc. Map 36, Pueblo Lands.
- 5. Assessor's Parcel: 344-120-26. A map is attached.
- 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. Rental value to be at least \$3,746 per month or \$44,952 per year. Note: A street vacation may increase the value.
- 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.
 - 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
 - 7. Access: The parcel has grade frontage on La Jolla Scenic Drive North.
 - 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 home by the lessee. The property is also being offered for sale with the buyer to pay for all closing costs and possible street vacation costs.

-1-

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 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 subject 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 requiring 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.

-2-

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. Nonconforming uses entailing a discretionary permit from the City may also be considered. The agreed-upon use or uses 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.
- 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 street vacation, some mapping may be required.

- Rent The City suggests an offer of at least \$44,952 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 reappraisals.
- 4. <u>Records</u>. 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 amounts of income subject to rental from the operation of the lessed premises. The records will be periodically audited by the City.
- 5. Right to Assign 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 proposed assignee or sublessee agreeing 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.
- 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.
- Taxes. The lessee must pay all taxes and assessments, including possessory interest taxes, levied by reason of its leasehold.
- 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 encumbrances.
- 13. <u>Development Plan</u>. 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 proposal development plan in the opinion of the City Manager may multify 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.
- 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.

-4-

- 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 use 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 inclusion of any additional information that will assist in the evaluation is encouraged. The adequacy, depth, and clarity of the proposal will influence to a considerable degree 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 auction or competitive negotiation of this lease.

- 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.
- Financial Statements. Submit current financial statements listing all assets and liabilities of the proposer, initial available operating capital and its source. Specify

-5-

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

- 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).
- Proposed Lease Term. Specify the requested lease term and justification therefor in terms of investment.
- Rental Offer. For a ground lease, the City recommends an offer of no less than \$44,952 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.

1. PREPROPOSAL CONFERENCE

To give prospective proposers an opportunity to ask questions about the lease agreement, proposal submittal, 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.

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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, 2000. 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 Ayenue, Suite 1700 San Diego, CA 92101

Attention: Shahriar Afshar, 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, Shahriar Afshar, 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.

- Responsiveness 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.
- Net Rental Offer The net amount of rent offered the City is an important factor in selection (see Section R).

-7-

- Professional Experience The past experience of the proposer in successfully developing and operating similar projects will be a significant factor in proposal evaluation.
- Financial Capability The proposer must exhibit the necessary financial responsibility and strength to successfully carry out the development.
- Development Plan The quality, attractiveness, and feasibility of the proposed development is another significant factor in selection.



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. OUALIFICATION 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.

-8.

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

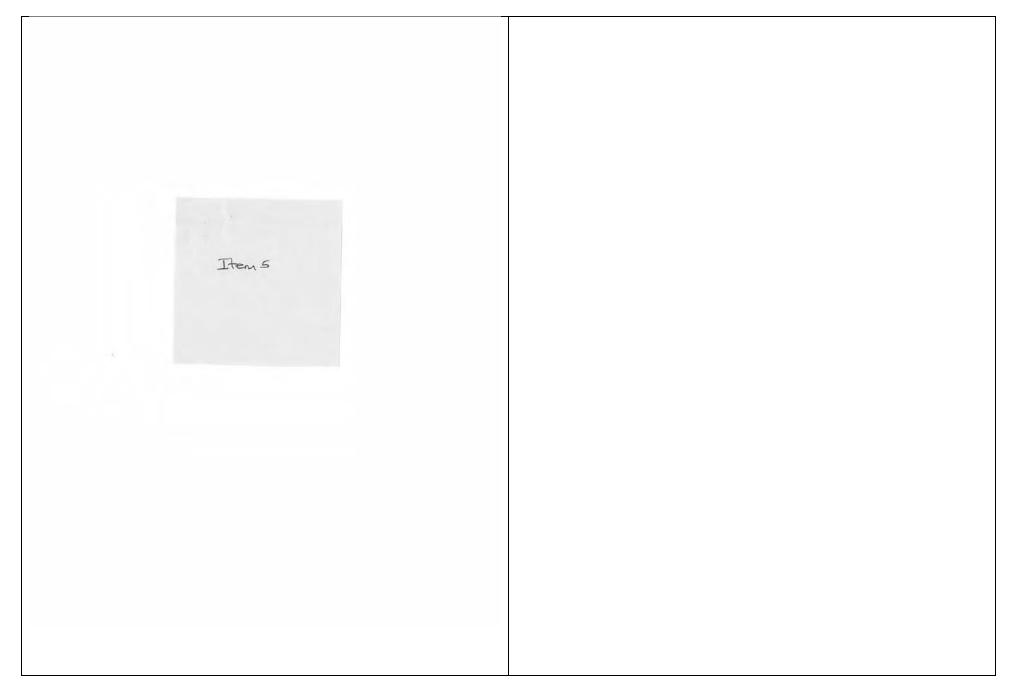
Maps and Drawings of Site 653

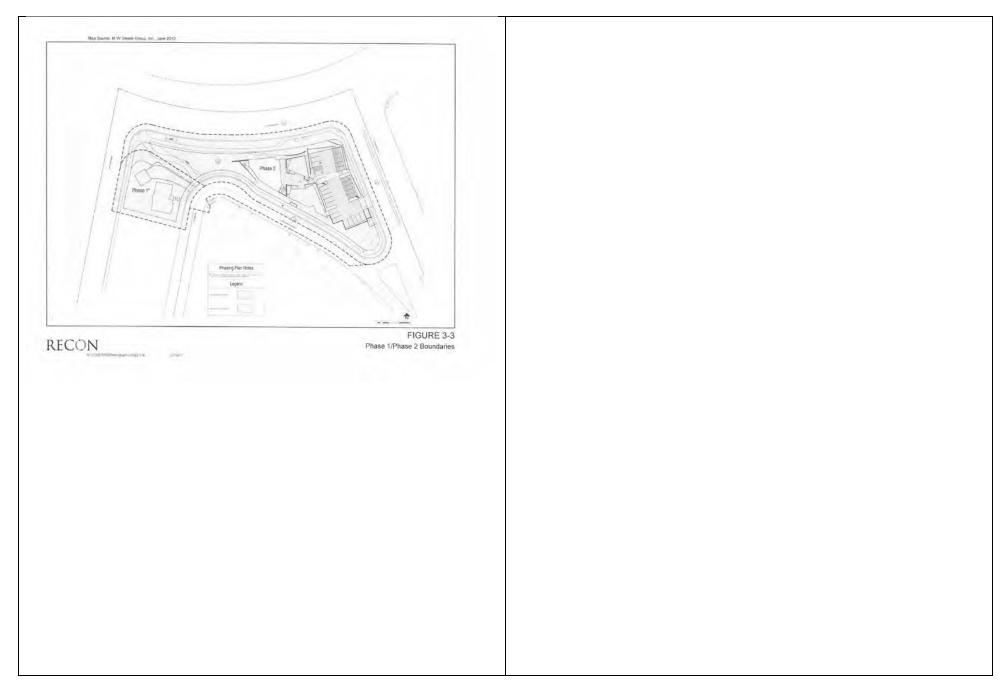
For further information, please contact Shahriar Afshar of the Real Estate Assets Department, 1200 Third Avenue, Suite 1700, San Diego, California 92101. Phone: (619) 236-7028.

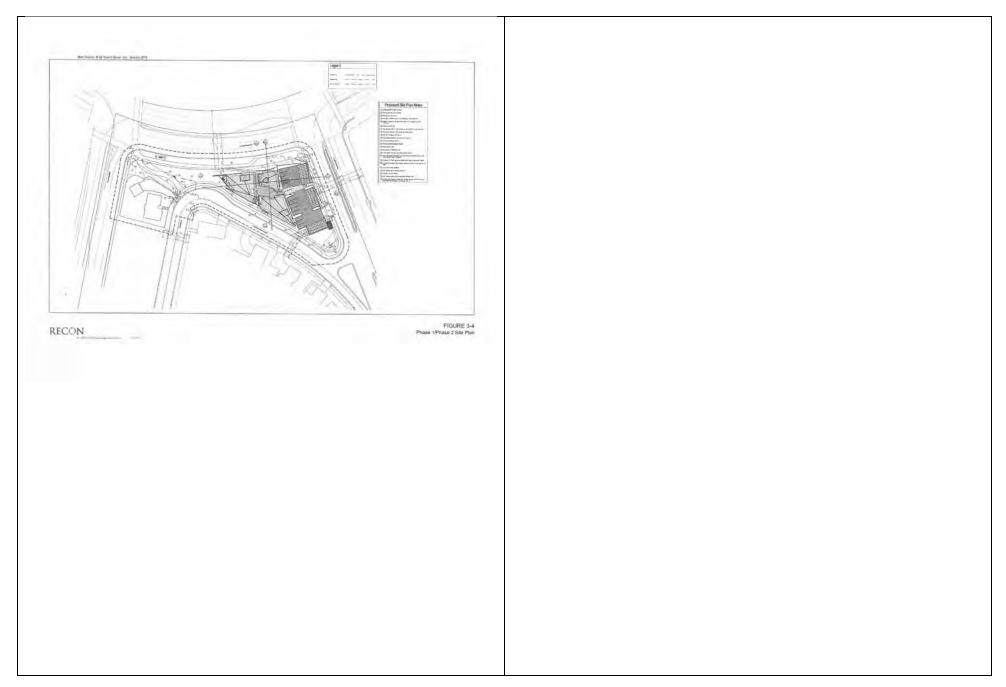
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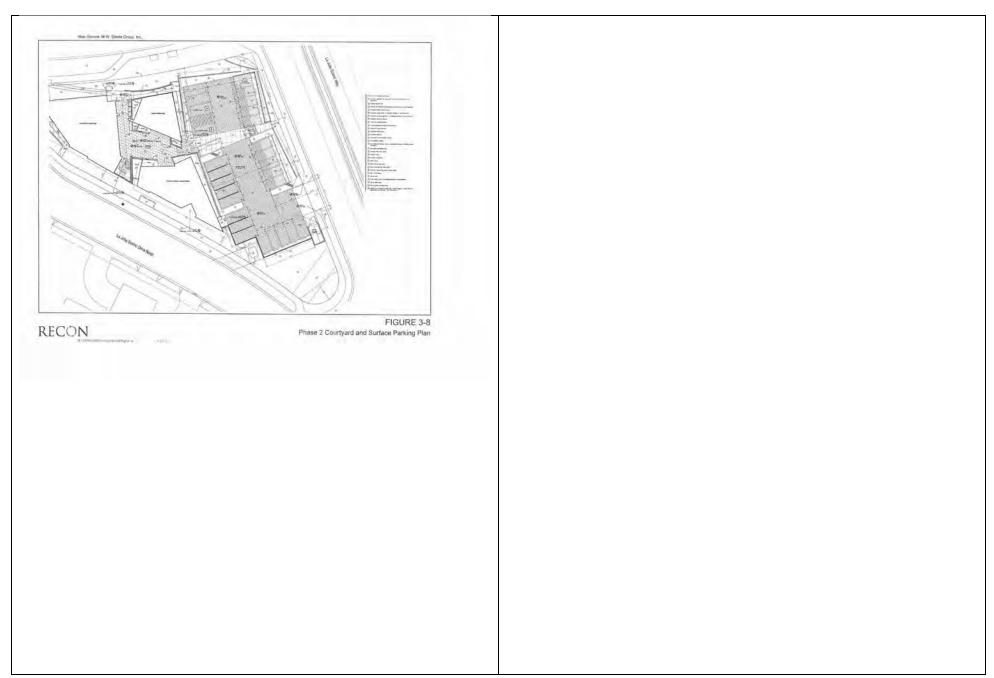
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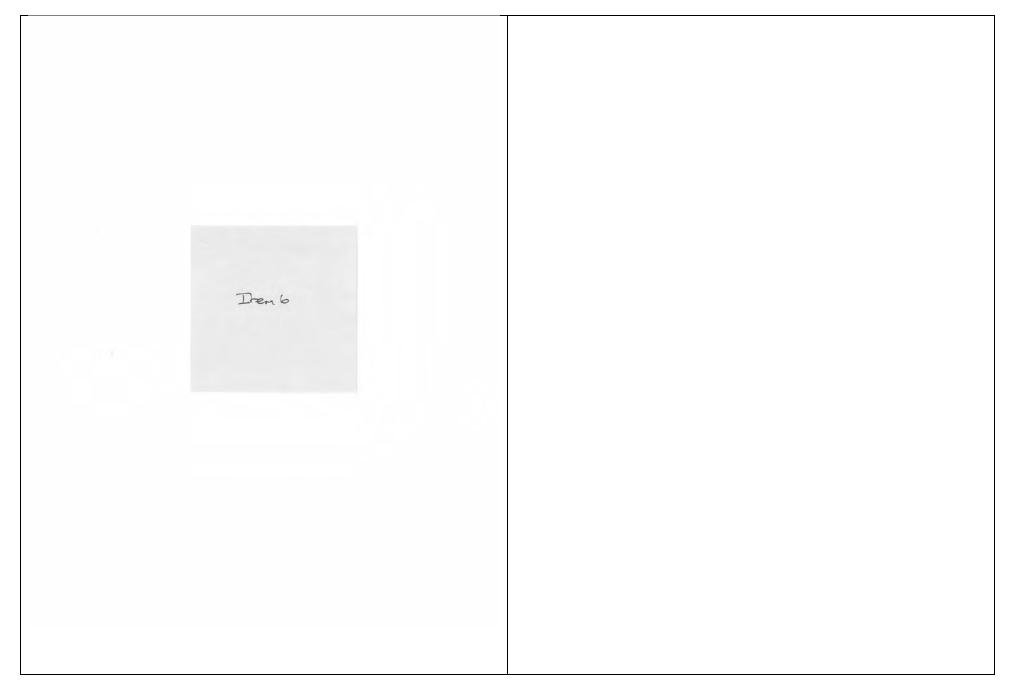
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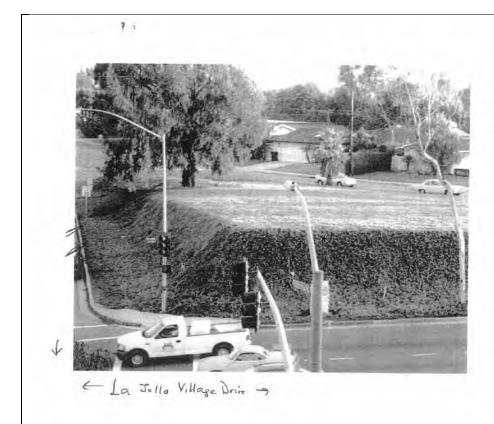
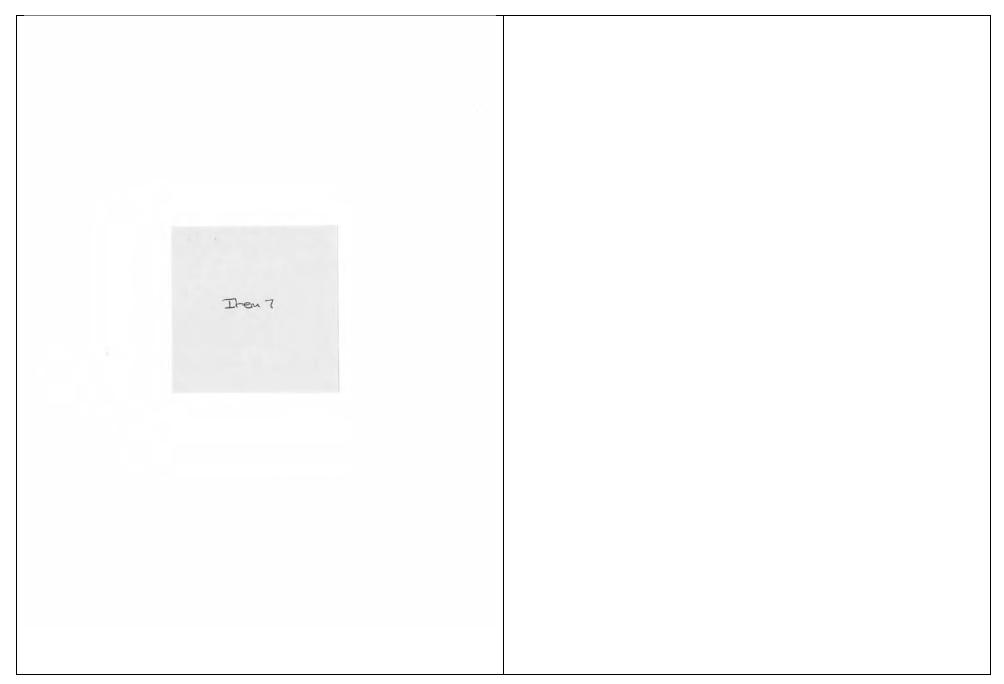


Exhibit A. Site 653



Zoning Facts: UCLA Hillel Facility November 15, 2002

7494 = 1145 = 1240 = 145

Into Source: City of Los Angeles, Planning Department - Zoning, Building & Safety

Phone: 213-977-6941 and City's Website

Subject Property: Hillel Facility (new location, just opened)

574 Hilgard Avenue, Los Angeles

Zoning: QR4-1-VL - "Multiple Dwelling Zone"

Q = "Qualified Classification" - 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, fratemity 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, 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.

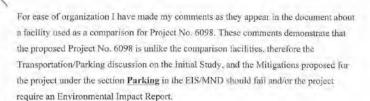
Attachments:

constant of Lorentz Summary of Zoning Regulations: City of Los Angeles – 2 pages City Code: SEC.12-11 – R4 Multiple Dwelling Zone – pages 171. 172 & 173

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 Phegley, 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.



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

Shabbat at the existing Hillel facility at UCSD and a profile of Jewish students at UCSD." (page 4 of 10 EIS.MND for Project 6098)

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 JO: 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 opinion or evidence does not constitute substantial evidence."



From my reading of the UCSB document, research of UCLA and UCB Hillel sites, and conversations with the 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 basing 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

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 and/or 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 Development Plan, 99-DP-032, 98-CP-075, 98-LA-023, 89-CP-107 RV01, 99-DP-036

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 fallacious.

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.

Page 3 #4

"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.

Page 7

Conditional Use Permit Findings [98-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...

Page 8

- 2.1.5 "As discussed in :6.2 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-H 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-H 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 s.f. per person) ..."

"The moveable 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-H, 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)

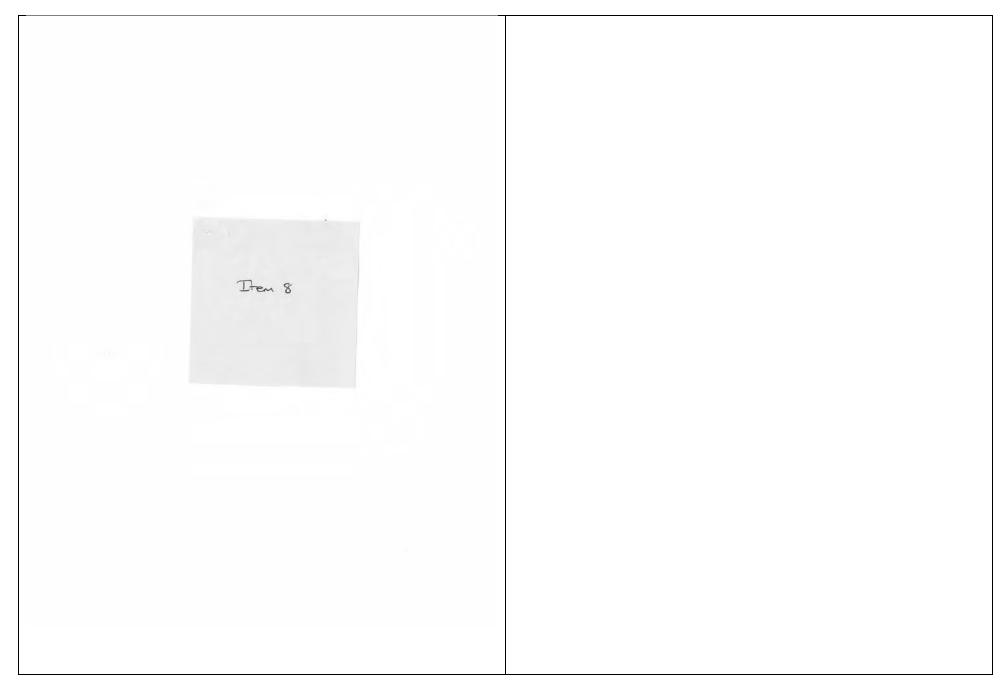
Page 40 (copy provided)

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.

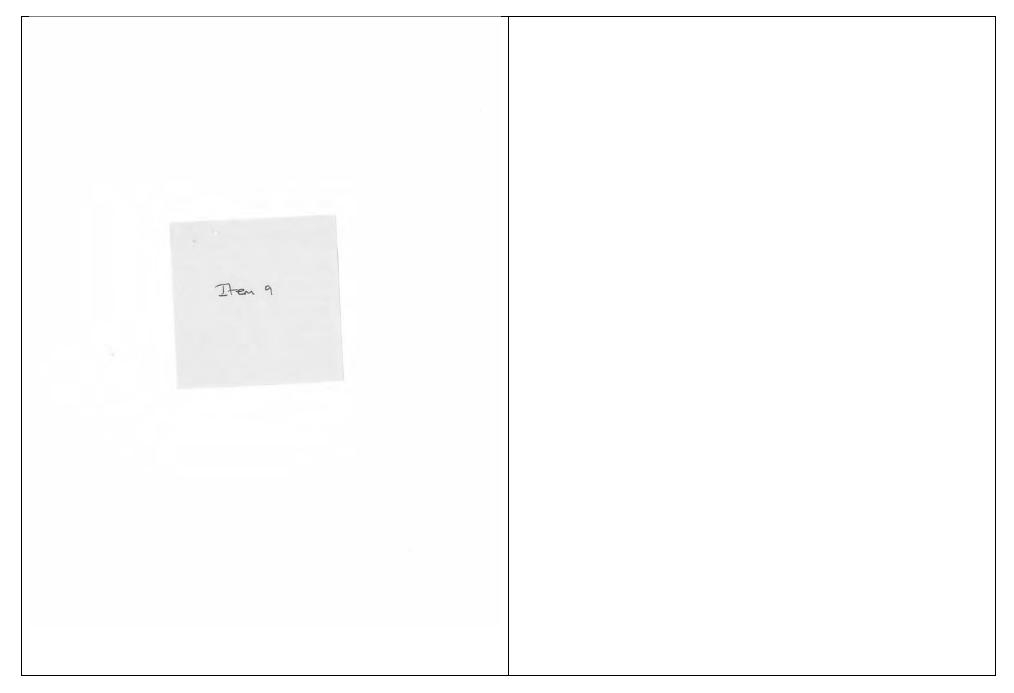


Cumulative Impacos - not taken ento consideration.



2-19-2013 Using google to access the Venter Institute web-site.

Less than one month poor-recordedation of the DEIR for Project is 212995







Location Map

PROJECT LOCATION

The Scripps Institution of Oceanography (SIO) Upper Mesa Neighborhood is a "hinge" area between SIO and the UCSD main campus and is envisioned for the development of facilities that would foster interdisciplinary programs focusing on environmental studies, and advance collaborations between SIO, General Campus and Health Sciences departments. The research activities of the Yencer Institute are clearly consistent with the programmatic vision established for this neighborhood.

PROJECT DESCRIPTION

The J. Craig Venter Institute (Venter Institute) is a non-forprofit research institute dedicated to the advancement of the science of genomics, the understanding of its implications for society; and the communication of those results to the scientific community, the public, and policymalers. Founded by UCSD almunas J. Craig Venter; Ph.D., the Venter Institute is home to approximately 200 staff and scientists, including three members of the National Academy of Sciences, and one Nobel Laureate. The Venter Institute operates one of the world's largest and nationally renowned genome sequencing centers at its. Maryland facility: the Institute is seeking to establish an additional research center at UCSD.

The Vercer Institute has been at the forefront of genomics research since 1992, producing results with wide-ranging applications in medicine, agriculture, energy, the environment, and biodefense. As of 2005, the combined operating budget for all Venter-related organizations was \$97 million (92 percent from competitive grants). Assets total more than \$200 million.

The Venter Institute's areas of scientific focus will continue to include: environmental genomic analysis with an emphasis on microbial biodiversity, ecology, and evolution; synthetic genome development; use of molecular and genomic methods

Scripps Upper Mesa Neighborhood

genomic development as the control of the control o

ACADEMIC COLLABORATION WITH UCSD

The Upper Mesa site effectively fosters collaboration among the Venter Institute, Scripps Institution of Oceanography (SIO), California Institute for Telecommunication and Information Technology (Cal-172), Health Sciences, and the general UCSD Campus.

In December 2005, Cal-IT2, SIO, and the Venter Institute received a \$24.5 million, seven-year award from the Gordon and Betty Moore Foundation to create a cutting-edge database and computational facility for metagenomic analysis of microbial life in the world's oceans. Additional collaborations with UCSD SIO researchers in marine metagenomics and genomic aerobiology are being planned.

In Health Sciences, collaborations between the Venter Institute and the UCSD Rebects and John Phores Cancer Center, along with researchers from Lowing Institute for Cancer Research and The Johns Hopkins University, will focus on mapping tissue mutations to genes. The UCSD Skags School of Pharmacy and Pharmaceutical Sciences will collaborate with the Venter Institute on the use of genomic information in the development of molecular therapies. Other collaborations are also being discussed with the Divisions of Biological Sciences and Physical Sciences.

UCSD Community Flanning 9500 Gilman Drive, La Jolla, California 97093-0993

UPPER MESA NEIGHBORHOOD PLAN



Upper Mesa Neighborhood Size Plan

Four parcels comprise the Scripps Upper Mesa neighborhood. Parcel 4, approximately 1.9 acres and located west of Forrey Pines Road, was to the Park Ecological Reserve and north of Allen-Find was found to best suit The Venter Institute project. Parcel 4.1s the largest of the four sites in this neighborhood and has the ability to accommodate the project without compounding the view corridors, setbacks, tiered development concept, and building design guidelines developed through the SIO Upper Mesa Neighborhood Planning Study (SUM NPS). Access to Parcel 4 is planned from Torrey Pines Road.

The Upper Mesa neighborhood site was selected following an evaluation of several sites. The selected site best fits the project size requirements, as well as a providing a location that best serves the Institute's programmatic needs.

DESIGN APPROACH



UCSD Community Planning 9500 Gilman Drive, i.a Jolla, California 92093-0993

The SUM NPS design guidelines indicated that Parcel 4 should be developed with a one-to-three story building that would terrace down from east to west and open up onto a pedestrian Belvedere Terrace overlooking the UCSD Park "Ecological Reserve". The Belvedere Terrace would overlook Skeleton Canyon, lower SIO, and La Jolla Cove. The Belvedere is a public component which includes the trellised walkway and the terraces and walls which extend from it to the individual building open spaces. The trellised walkway would be continuous and connect the four buildings.

The planned building would contain approximately 45,000 gross square feet. Specific building design will be undertaken by The Venter Institute's architects and will be subject to UCSD design review and approval.

To allow for appropriate landscape edges, the plan identified a 25-foot landscaped setback from Torrey Pines Road, a 60-foot seeback from North Torrey Pines Road and a 75-foot setback from fire protection from the planted 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 Tarrey Pines Road to meet the parking demand associated with all four development parcels. As The Venter Institute facility would be a ground lease, 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/Mitigated Negative Declaration (IS/MIVD). The sindeveloped site contains mostly non-native grasslands and mitigation is planned in accordance with the 2004 Long Range. Development Plan Environmental Impact Report. Stormwater 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 Zona 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, Regents approval, and coastal permitting will be completed by Jane 2007. The project is scheduled to start construction in the Fall of 2007 with occupancy in Spring 2009.

Oxpered September 1006

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 hinge 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

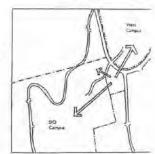
As the neighborhood forming the link between SIO and West Campus, the site plan adheres to the ideas of continuity in the Master Plan, namely through its pattern of development, view corridors, pedestrian links and landscape elements. The following principles occur:

- The neighborhood will have a clear community focus via a shared outdoor 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 grove into the neighborhood.
- The pedestrian routes which converge on this intersection will be continued into the site as 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.
- The view corridor from the theatre district 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, this site plan adheres to the "spirit" of the SIO neighborhood planning principles. These have been interpreted as having an organic relationship to the land, interewining buildings and landscape. The following principles occur:

- The buildings are low in scale (one, two and three stories high).
- The buildings form courtyards oriented towards the landscape and the views.
- . The buildings and landscape elements are intertwined.
- The plan is topographically explicit, capitalizing on the views to the West and south, and responding to the shape of the land.

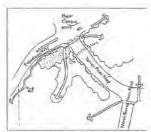


Upper Mesa Neighborhood Planning Scurl Scripps Insutation of Oceanograph

She is a hinge.

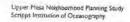


Buildings may have urban edge to streets with openingto view and landscape.



Grove continues through site.

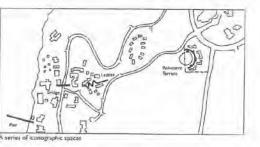
Adèle Naudé Santos and Associates & Spuriock Poirier





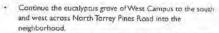
Buildings and landscape scrongly integrated.

In the spirit of the man-made structures that have given specificity to the SIO neighborhoods such as the pier, the bridge, and the ladder, this neighborhood is planned around the Belvedere, the terrace that frames and directs the view of the SIO campus and the ocean. It is the final element in this iconic sequence.



C. Landscape Continuity

The landscape concept takes its direction from the rustic and discrete landscapes described in the Campus Landscape Planning Study. Creating continuity in the rustic landscape includes visually linking West Campus and the SIO campus across North Torrey Pines Road, linking the site 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 discrete landscapes of the neighborhood, as in other parts of the campus, can be sheltered or visually enclosed by buildings and have their own unique character. The following principles are proposed:



- Rerain the Torrey pine trees and add additional Torrey pines along Torrey Pines Road to create a distinctly different character along the east edge of the neighborhood across from residential uses.
- Bring the character of the low growing scrub of the Ecological Reserve up and into the neighborhood on the south and west, but consider summer drought appearance, fire hazard, invasiveness, as well as Irrigation runoff into the Ecological Reserve.



Adèle Naudé Santos and Associates & Spuriock Point

Upper Mesa Neighborhood Planning Stor Scripps Institution of Oceanograph Edges The site has two distinct edge conditions, one relatively urban, noisy, and public, the other rustic, quiet and relatively private. In order to respond to these conditions, the following principles are proposed: Street trees screen the buildings from view from the . Buildings are set back from Torrey Pines Road and North surrounding roads 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. Buildings form courtyards open to the landscape and the view. 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. Three floors to parking edge. Adèle Naudé Santos and Associates & Spuriock Poirie

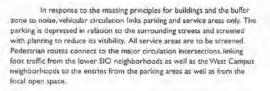
Upper Mesa Neighborhood Planning Study Scripps Institution of Oceanography

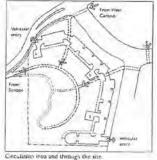


Buildings step down in profile with lower roof cerraces and entry from both sides.

- On the open space, buildings will step down in profile to one and two stories forming courtyards open to the landscape. Uses such as offices, seminar 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.

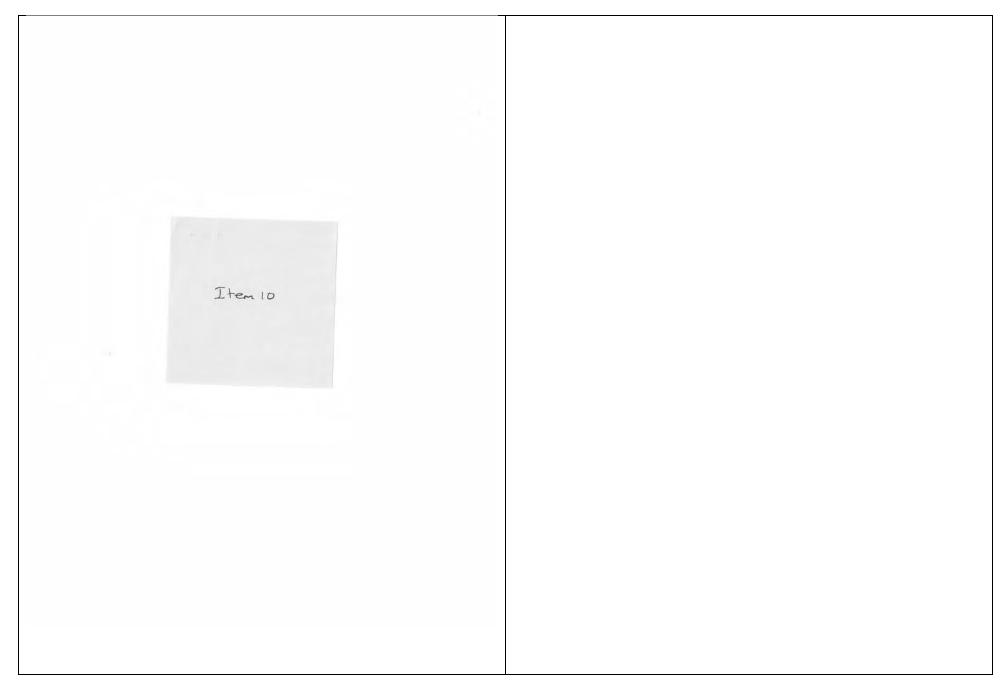
F. Circulation

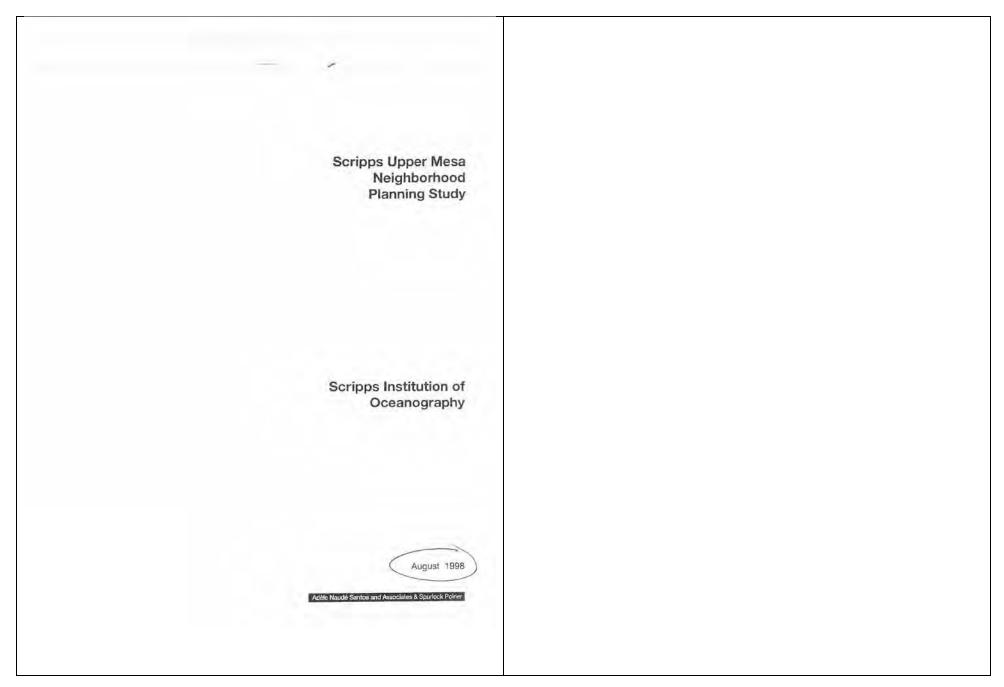




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Adèla Naudé Santos and Associates & Spurlock Poirier





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Upper Mess Neighborhood Planning Study Scripps Institution of Circanography

EXECUTIVE SUMMARY

The objective of the Scripps Institute 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 STO.

A neighborhood plan and planning principles that organize the program and planning requirements and establish the overall development and landscape pattern in relation to the surrounding context; and

design guidelines that support the plan and suggest the character of the buildings and landscape.

The Upper Mesa Neighborhood size is located 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. The neighborhood has prominent fromtage to the public roadways and commands views of the Pacific Ocean to the west and Mount Soledad to the south. The topography and vegetation of Skeleton Canyon extend into the site on the western edge, but most of the rest of the site has been graded to a gentle, even slope: Two faults have been mapped on the site and will require further investigation prior to development. Utility service for new development will require a phased approach, taking advantage of nearby connections for the short term and linking to the campuswide systems as they are extended through the site.

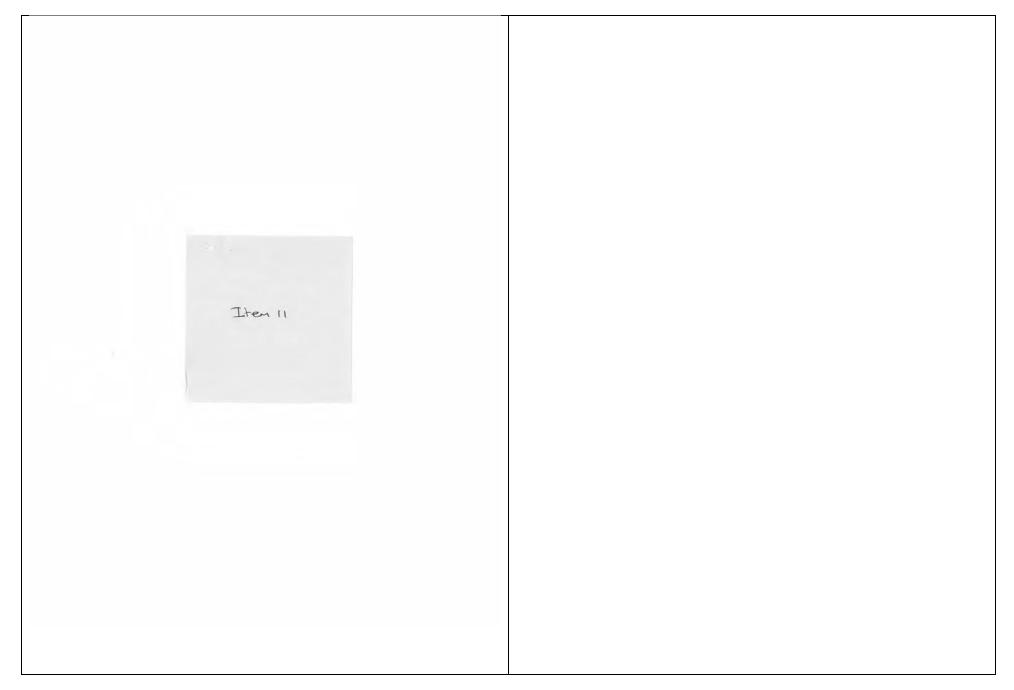
Development patterns on the site will recognize it as a "hinge" between the main campus and the SIO campus, both in terms of circulation and in terms of the landscape. View cornidors and vehicular and pedestrian access are the starting point for planning development.

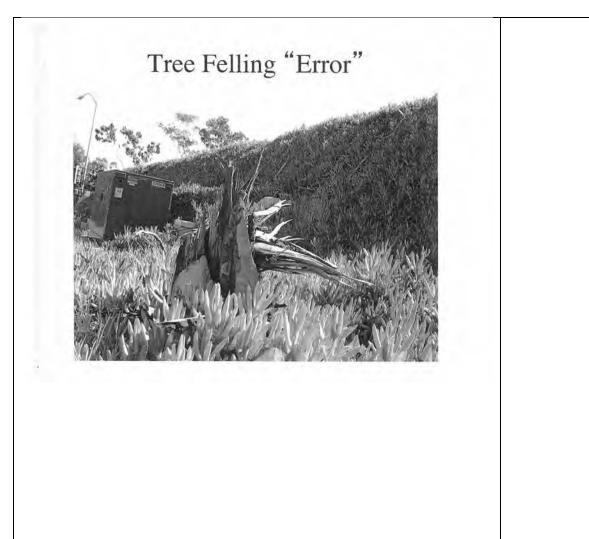
The development program for the neighborhood consists of academic and research uses with associated parking. Because of the position of the shears a link between the main campus and SIO campus, joint use facilities and programs that draw on the resources of both campuses are prime candidates for locating in the neighborhood. A facility 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.

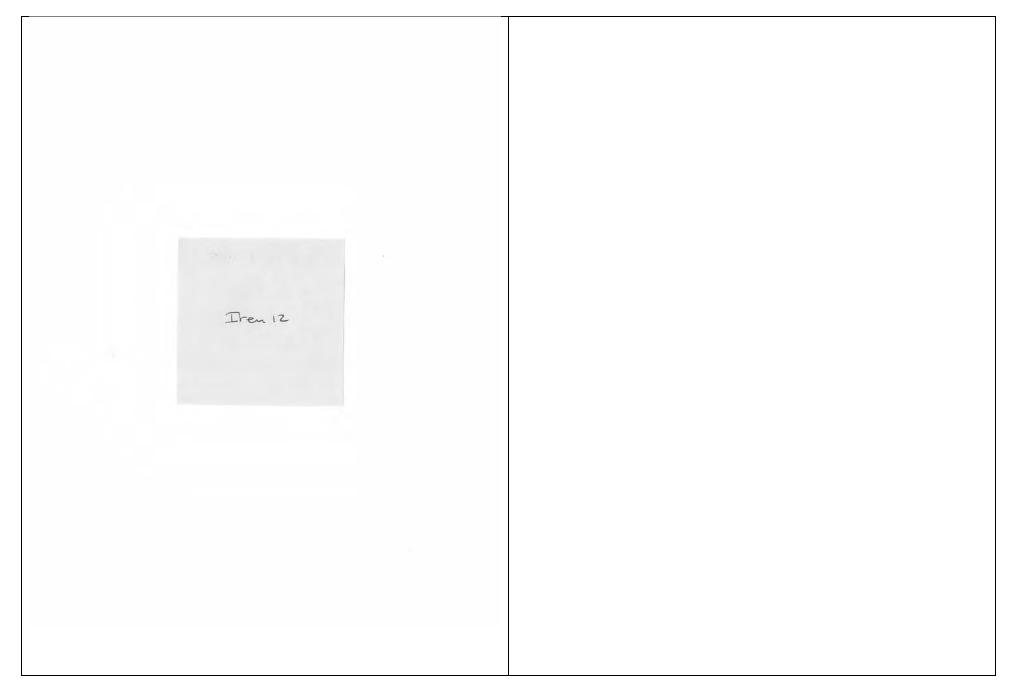
The planning principles are designed to capitalize on the natural amenious and characteristics of the site, while extending the spirit of the SIO Master Plan. The plan extends the SIO campus idea by adding a fourth iconographic element to the circulation path connecting the ocean and the main campus. The series of spaces that begins with the Scripps Pier and continue via Scripps Crossing, a pedestrian bridge, and up the Scripps Ladder will culminate 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 spicial exchange while enhancing the connection to the foreground landscape of Skeleton Canyon and the distant view of the Pacific Ocean.

Adèle Naudé Santos and Associates & Spuriock Poirier

Upper Mesa Neighborhood Planning Study Scripps Institution of Oceanography Six key design principles underlie the provisions of the neighborhood plan. The principles reinforce the values of the SIO community and stress the creation of linkages that tie this pivotal site into 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 connective element for the parcels within the neighborhood. A trellised 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 eucalyptus grove of the main campus is extended across North Torrey Pines Road to treate a landscape connection on the north side of the site, while the Torrey pines along Torrey Pines Road are enhanced through additional planting. The campuswide principals 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 outlook 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 ocean vista as an important common amenity. The view corridor plays an important role in the landscape concept, as it separates the Torrey pine landscape from the main campus eucalyptus grove. Recognition of the edge conditions provides useful clues for effective use of the site. The streets on the north and east of the site are urban: busy and noisy, but provide the site with a high degree of visibility. Buildings are set back from the street edges with a buffer of parking and landscaping. Entries to the buildings from the street side are accentilated to create a visual focus. The western exposure to the Reserve and the view is quieter and more rustic. The buildings are more open on this side, and form courtyards that connect to the common open space of the Belvedere. Building form and character respond to the edge conditions and microclimate in ways that enhance the usefulness and amenity of the work spaces. The mass of the buildings steps from three story height roward the streets 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. Vehicular circulation and parking are used to create a buffer to the busy surrounding streets. Taking advantage of the existing grades, 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 Expidition Way and North Torrey Pines. Road, connecting to Revelle College, which shares some programmatic affinity with the planned uses in the neighborhood. The pedestrian path up Expidition Way from SIO connects directly to the Belvedere, continuing the spirit of the lower SIO campus.

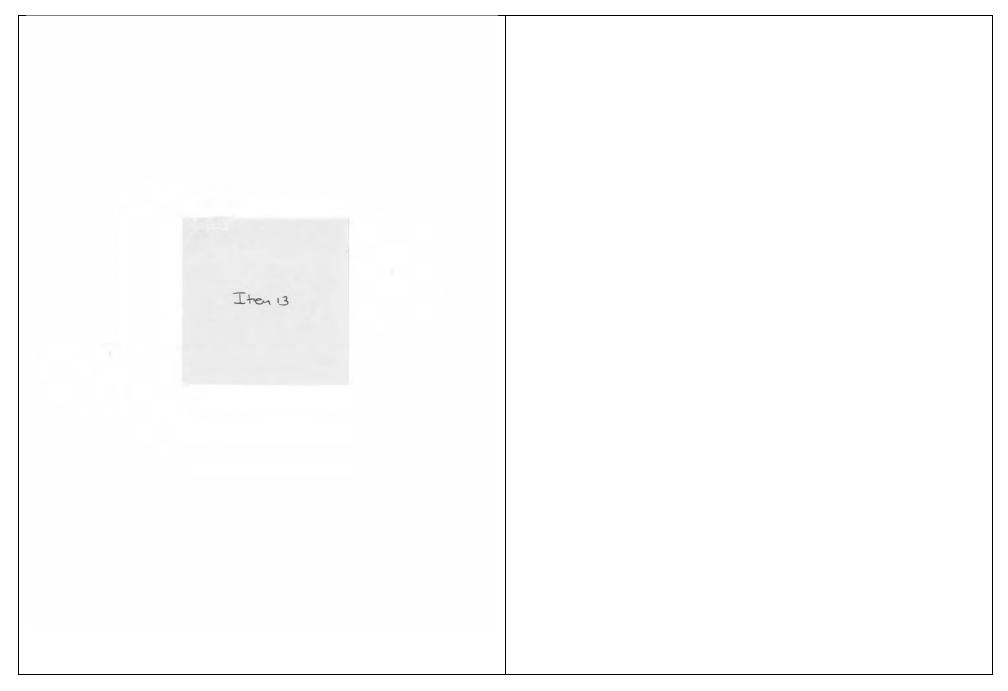


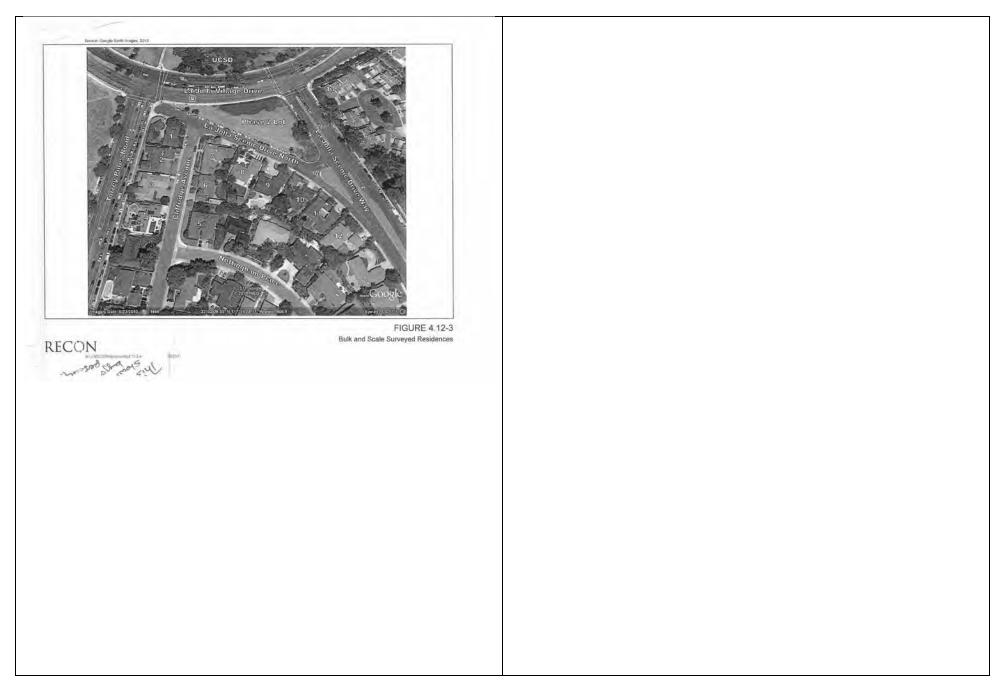


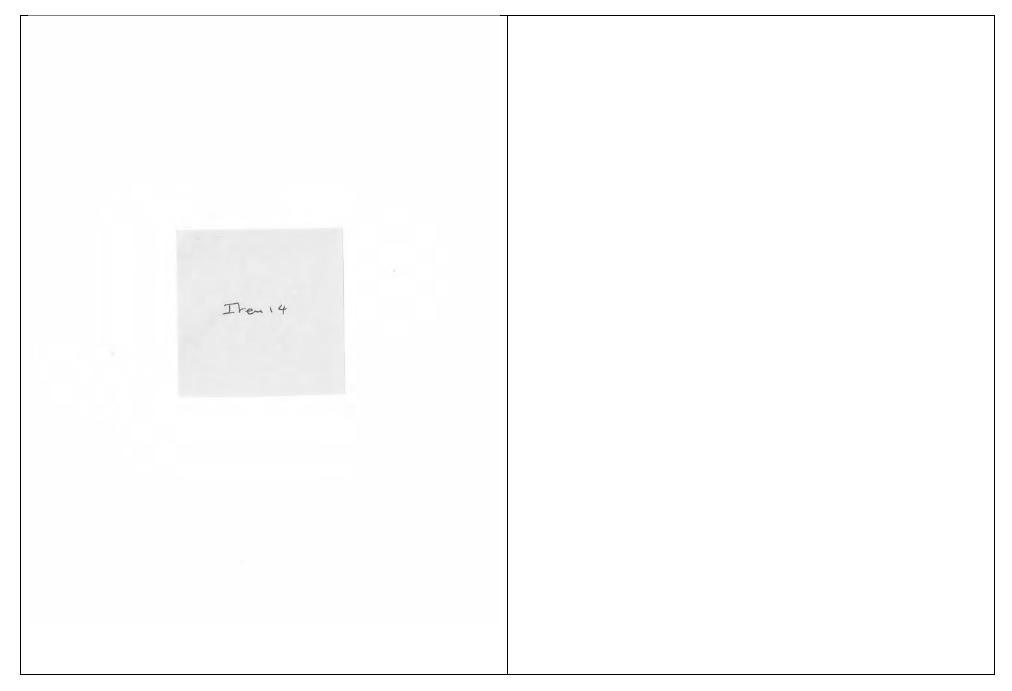


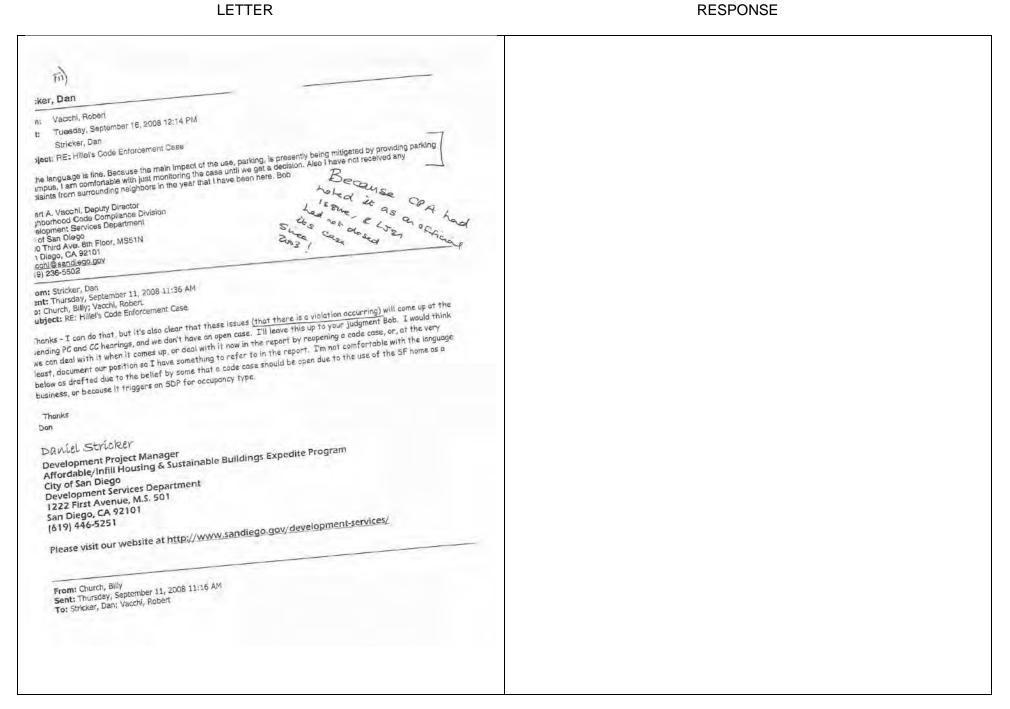
Bulk and Scale 26 ft >?



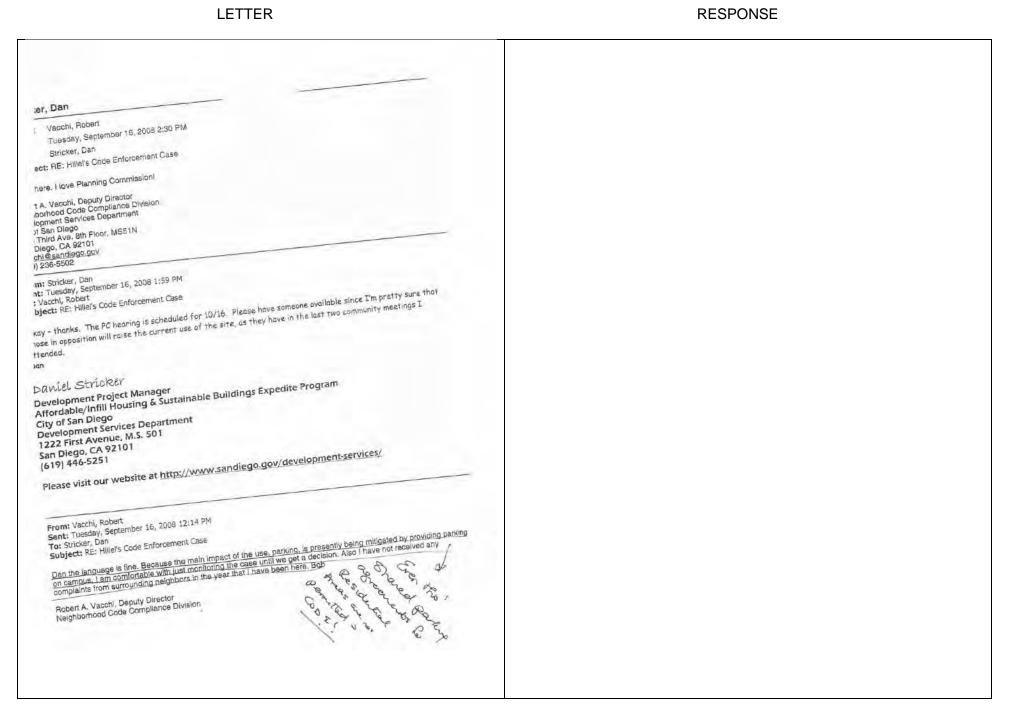








RESPONSE



Page I c Stricker, Dan From: Church Billy Sent: Tuesday, September 02 2008 7:38 AM Stricker, Dan; Vacchi, Robert Subject: RE: Hillel Code Case Perhaps you should be splitting fuzz? | agree with the synopsis, a NCC case can be reopened if project denial occurs. We could consider timelines as conditions in the permit to require the oblighing of the required building permits and installing the parking for phase 1 assuming project approval. Project was not ever carpleted Sent: Thursday, August 28, 2008 5:03 PM Dan Stricko was Concerned about the Project & abour community - bur orandden) To: Vacchi, Robert; Church, Billy Cc: Stricker, Dan Subject: Hillel Code Case Bob and Billy, 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 From your voice mail Bob, it sounds like you are saying that the code action was opened since it was determined to be a religious use, and not an office use, which triggers the need for an SDP. Billy is saying (and I'm reading in the SDMC) that the PDO requires an SDP for any remodel/alteration which triggers the need for a building permit. SDMC Section 1510.0201 (a) states that "A La Jolia Shores Planned District Permit shall be issued before the commencement of any work in the erection of any new building or structure, or remodeling, alteration, addition, or 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 a building permit. Based on the following statement, a building permit for an "alteration" is required, and it is this building permit which requires the issuance of an SDP. I need to get this straight and into the hearing documents, as well as be versed in this when I attend the CPA meeting next week. It really appears as though they would be in violation for not having a building permit for the change of occupancy (and perhaps for not having the required number of parking spaces?), before not having an SDP. The SF zone does permit a church, temple or building used primarily for religious purposes, so the use is not an issue. As Bob explained in his vaice mail, as long as Hillel is currently processing a project which would cover the parking and SDP issues DSD is allowing them 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 I may be splitting hairs, and I apologize if I'm going too for with this, but to be honest, spelling it out like this helps me to understand it, and also to be able to explain it to members of the community, the applicant, and

Page Lof 1

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Stricker, Dan

From: Church, Billy

Sent: Monday, August 25, 2008 12:28 PM

To: Stricker, Dan Subject: RE: Hillel

I think they mean "change of occupancy", which is a building permit to change from R3 to B2 (dwelling unit to office). The NCCD case has been closed, but the religious office use would require the parking be provided.

Does that help? I can come by.

From: Stricker, Dan Sent: Friday, August 22, 2008 5:08 PM To: Church, Billy Subject: Hillel

BC

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 PDO, correct?

On another note, apparently there is a code violation case on the SF residence at 8976 Cliffridge. 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 L and 2 for Phase I. 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 will meet California Building Code requirements for the change of use including an increase in off-site 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 an office in violation of regulations and the religious office use has not complied to date with the parking requirements. With this approval, six parking spaces will be provided at 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.

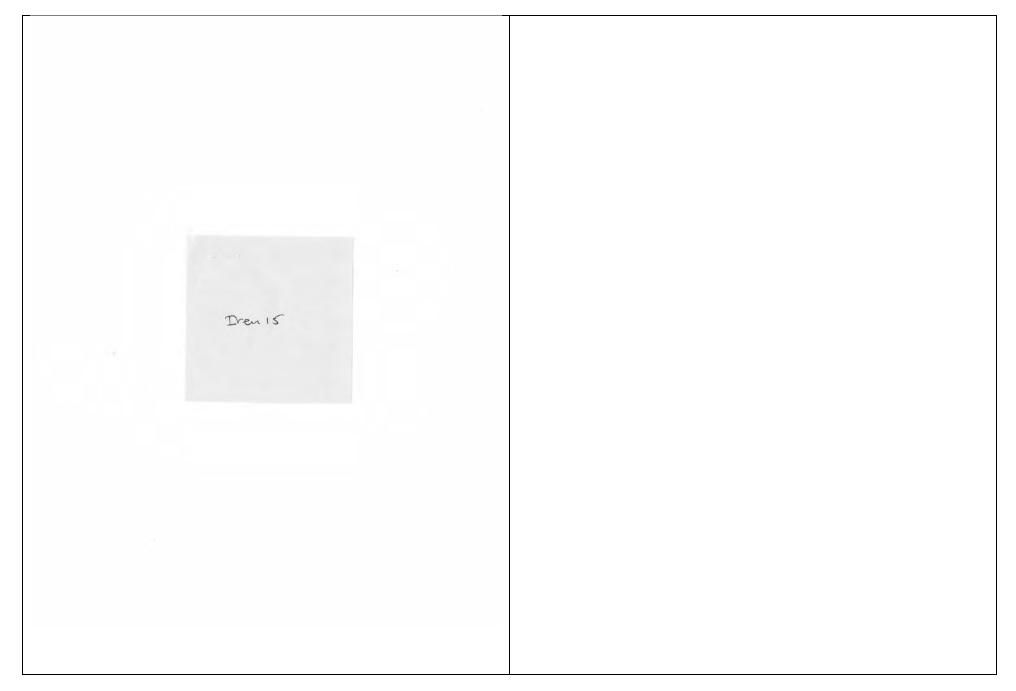
Thanks D

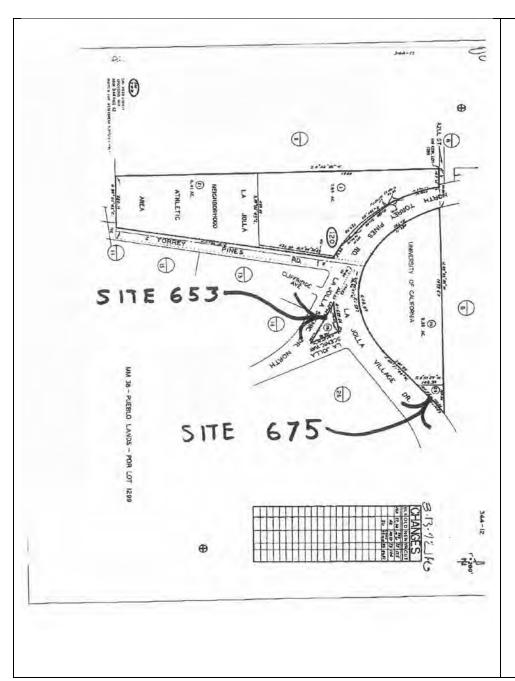
Daniel Stricker

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

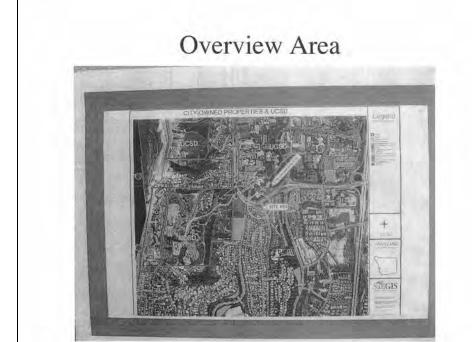
Please visit our website at http://www.sandiego.gov/development-services/

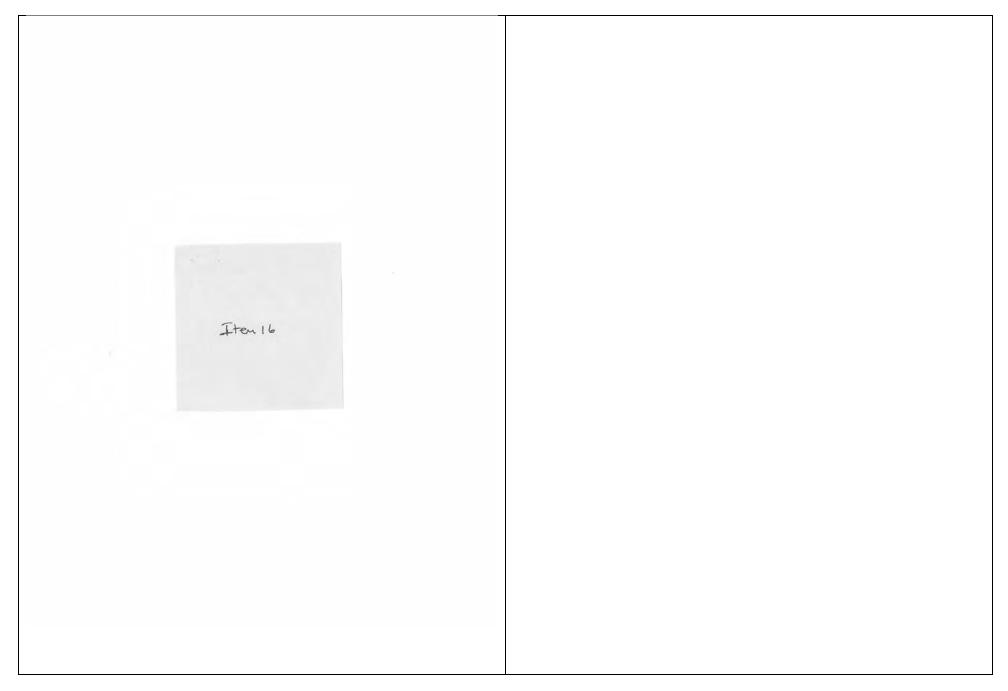
-





SITE NO: 675 FILE CODE: PIOC PROPERTY DESCRIPTION PGAL DESCRIPTION: Portion Pueblo Lot 1299 DUNLION: Le Jolla Village Drive portheast of La Jolla Scenic Way .CREAGE: -31 (13,416 sq. ft.) DEISTING ZONE: R1-5000 COMMUNITY FLAN ESIGNATION: University Community Plan designates site as University of California COMMENTS: OUNCIL DISTRICT: RECOMMENDATIONS UBLIC USE: Institutional BLIC USE: EVELOPMENT COMMENDATIONS: COMMENDED Transportation & Land Use Recommendation - Designate for sale (negotiated to DCSD) SPOSITION: MUNITY FLAN TFORMANCE: Yes MENTS: Housing Commission staff recommneds site for housing. Property has no acess to La Jolla Village Drive and is landlocked. Property is surrounded by DCSD ownership City Manager's Recommendation - Same as T & L U Per Council Resol. \$250384, 10-9-79, desig. for sale (neg. to UCSD) EXHIBITH







May 9, 2007

Brad Werdick University of California, San Diego 9500 Gilman Drive La Jolla, Galifornia 92093

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 Messineighborhood. 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 Torray Pinos Road/La Jolla Villago Dirve 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 statif, In a meeting on Soptember 25, 2006. City staff indicated they were not supportive of either a left-turn ingress or left-turn eggess from Torrey Pinas 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 on-street parking to be removed to provide adequate sight distance for egress 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 flow 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 storage packet during the PM peak hour.

Existing With Project Conditions



- The proposed project is estimated to generate approximately 60 AM peak hour, 50 PM peak hour and 360 daily lrips.
- 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.

15707 Rocidield Soulevard, Suite 155. Invine, CA 92618 (945) 659-3200. Fax (949) 859-3209 www.fehrandpeers.com

Mr Brad Werdick May 9, 2007 Page 2 of 12





- 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
- . 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 driveway 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.
- . The project driveway should be 24-30 feet in width,



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 involumovements.

 Red curb on Torrey Pines Road should be extended (approximately 210 feet) from its current terminus south of La Jolla Village Drive to the proposed project driveway to ensure clear corner sight distance.



Mr. Brad Werdick May 9, 2007 Page 5 of 12



compared to counts used in the University's 2004 Long Range Development Plan, The recently collected 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 95" percentile wastbound left-turn queue at North Torrey Pines Road/La Jolla Village Drive is 580 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 330 feet before it becomes a queuing issue of the adjacent intersection. For the remainder of this report we have presented the calculated queues (580 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 with 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 <u>Scripps Upper Mesa Neighborhood Planning Study and University staff</u>, the long term or planned development for Parcels 1-4 will be comprised of <u>135,200 square feet of scientific research and development uses. The Venter project on Parcel 4 is the first project to be proposed in this portion of campus and would consist of <u>45,000 gross square feet of scientific research and development facilities.</u> The development schedule for Parcels 1-3 is unknown.</u>

Figure 2 in Attachment A shows the Parcel 4 site plan. Access to Parcel 4 would be provided by an unsignalized 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 the property of Parcels 1-3 a full access driveway would be constructed at some point in the future on Expedition Way. This connection is not assumed with development of Parcel 4 only.

Attachment D contains the raw traffic count sheets. The volumes shown in the figures have been manually balanced between adjacent intersections as part of nearby University-related projects.

Mr. Brad Werdick May 9, 2007 Page 6 of 12



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 estimates 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 summanzes the estimated trip generation for Parcels 1-4 of the proposed project.

	Research and Development 25.8 8.0 16% 14% 257 37 4 41 4 32 36 38 4 48 41 41 42 45 36 38 4 48 41 41 41 41 41 41											
				Trip Rates	1				Trips			
Parcel	Land Use		100,000	AM	1 460	Della	AM	A Peak H	our	PI	V Peak Ho	our
						Liany	In	Out	Total	In	Out	Tota
1		32.5	8.0			560	38	4	42	4	32	36
2		32.1	8.0			257	37	4	41	ok.	32	36
3.		25.8	8.0			205	30	3	33	3	26	29
4		45 0	8.0			360	52	6	58	5	45	50
	Total Land Use	135.2		Total N	ew Trips	1,082	157	17	174	16	135	151

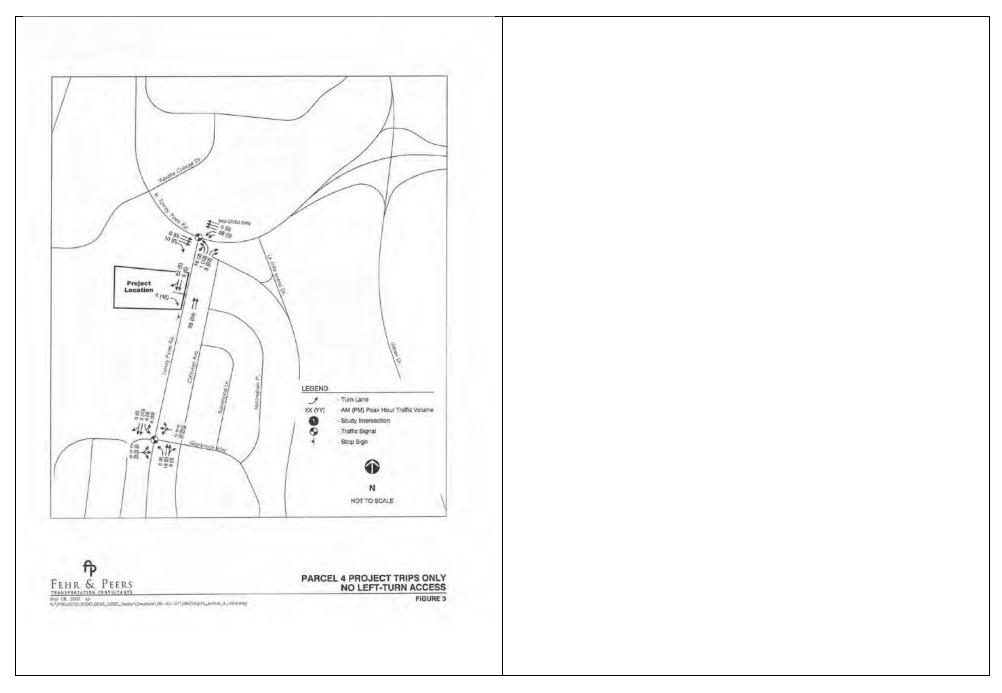
As shown, the Venter project (Parcel 4) is expected to generate 360 daily trips, including approximately 60 AM peak hour trips and 50 PM peak hour trips. These trips were assigned to the project driveway and adjacent study intersections.

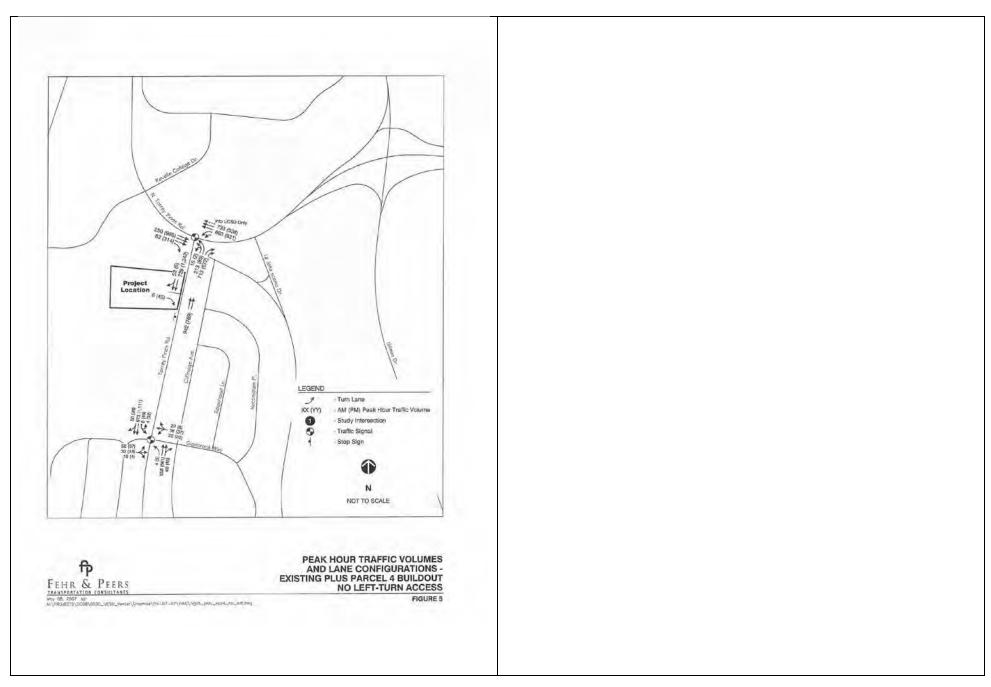
Trip Distribution

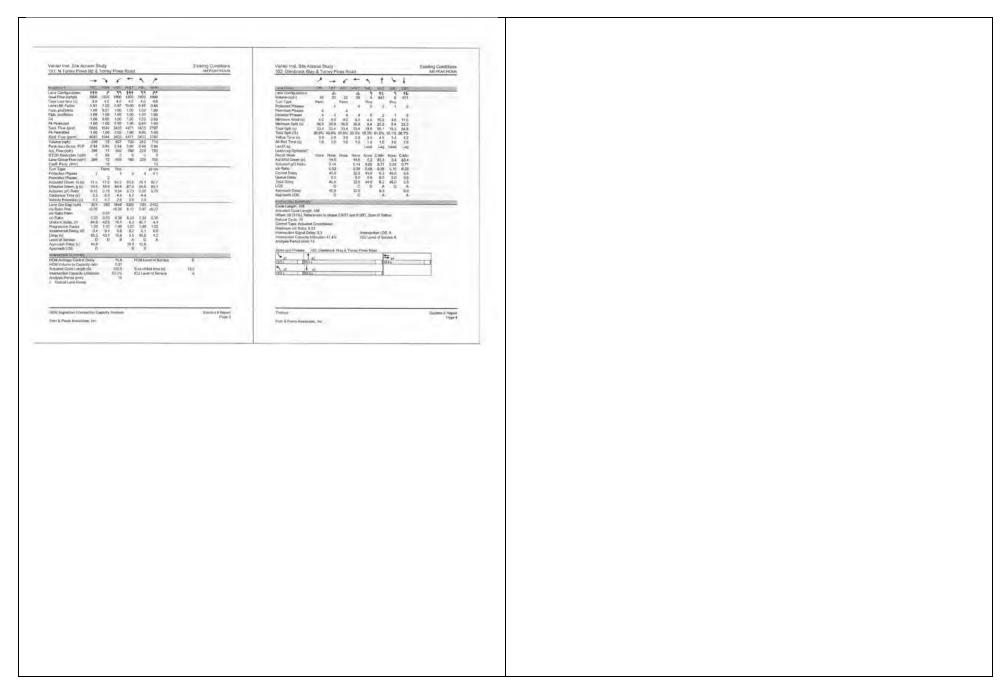
City of San Diego Municipal Code, May 2003. KSF – Indusand square feet

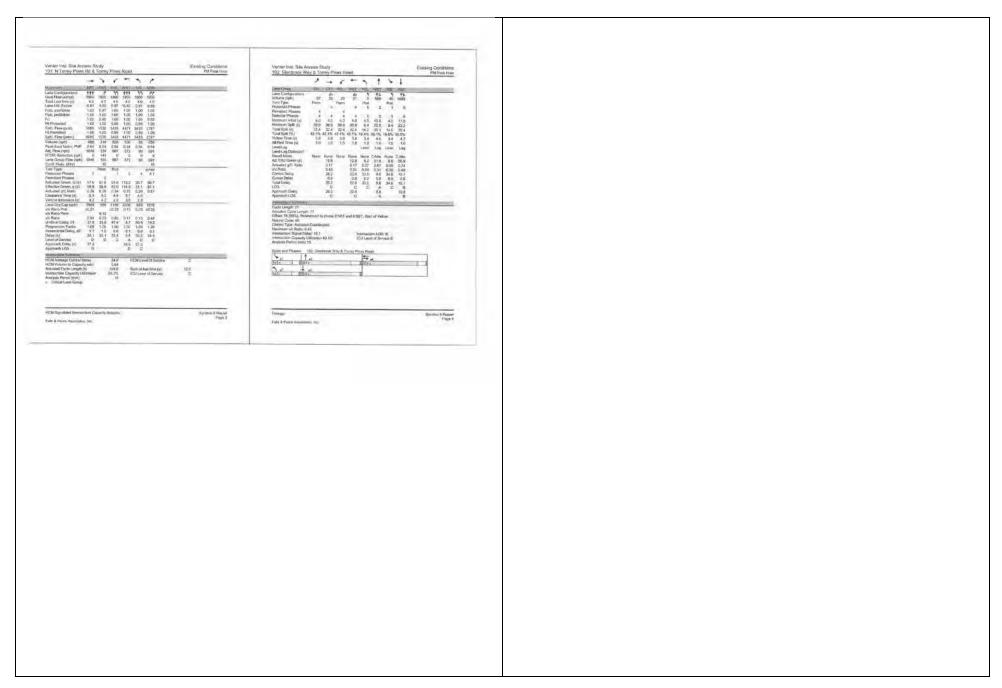
We determined the expected distribution of project trips onto the adjacent roadway network based on existing traffic volumes, the location of complementary land uses, and previous development studies from the University. The following is the expected trip distribution:

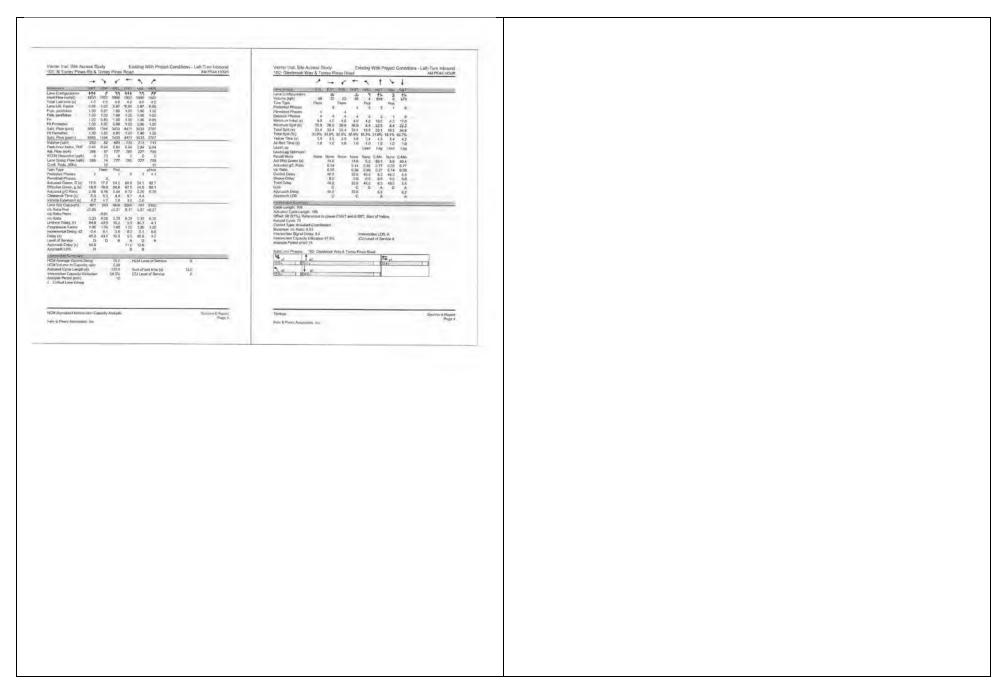
Directionality	Percen
To/from the east on La Jolla Village Drive	50%
To/from the west/north on North Torrey Pines Road	d 20%
To/from the west/south on Torrey Pines Road	30%
(Old)	1300770

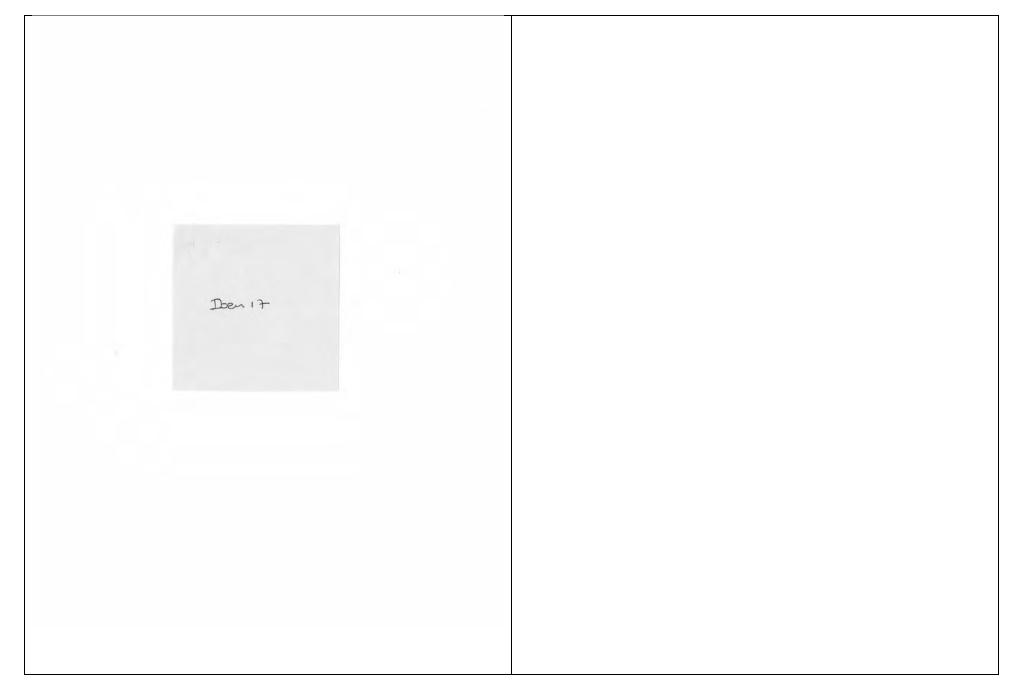












ICVI: J. Craig Venter Institute Breaks Ground on La Jolla, California's First True Sustainable Laboratory Facility

2/26/13 4:43 P.





PRESS RELEASE

FOR IMMEDIATE RELEASE

Craig Venter Institute Breaks Ground on La Jolla, California's
 First True Sustainable Laboratory Facility

SAN DIEGO, CA — September 20, 2011 — The Jr. Craig Venter Instatute (DCVI), a not for profit genomics research anothere, boday held an official groundbreaking ceremony for their new Colliviania govern; The 2012 building, ceasinged by 205 Anothetects, will be a state of the net, "bitra-green" 45,05th squeen boot, highly adaptable, wer belondercy and computational segeratory building on the University of California, 2nn Deeps (UCCI) campus. The building stated in the immigration of 2013, will semplon 125 schemists and soft.

"We are thrifted to be embanking on this dow building project have not the changes of UCSD. The building is a unique design that will midd the environmental philosophies of our genomics research with the sostalhability goals that I believe must be part of all of our lives," said J. Craig Ventor, Ph.O., "ounder and presidence, JCVI. "I am also excited to be lack on the USSD campus, my alms mater, to particular the rich academic research and plack on the USSD campus, my alms mater, to particular the rich academic research and placed environment here. We look ferward to continued and strengthened calibbarations with all here at USSD and its greater's sain Diego research and bidetect community."

In addition to 2CVI president and founder, 2. Craig Venter, speakers at the event included: Mary's Anne Fox, UCSD Chancellot; San Diego Mayor Jerry Sandlers; Bovid Bressler, M.O., Vigo Chancellot for Indetty Selection and Danard the School of Medicine; and Tony Haymet. 99. D., Director of Scripps Institution of Oceanography, Vice Chancellor for Marine Sciences, and Danard the Sandlers Selection of Marine Sciences.

Important features of the new JCVI building include:

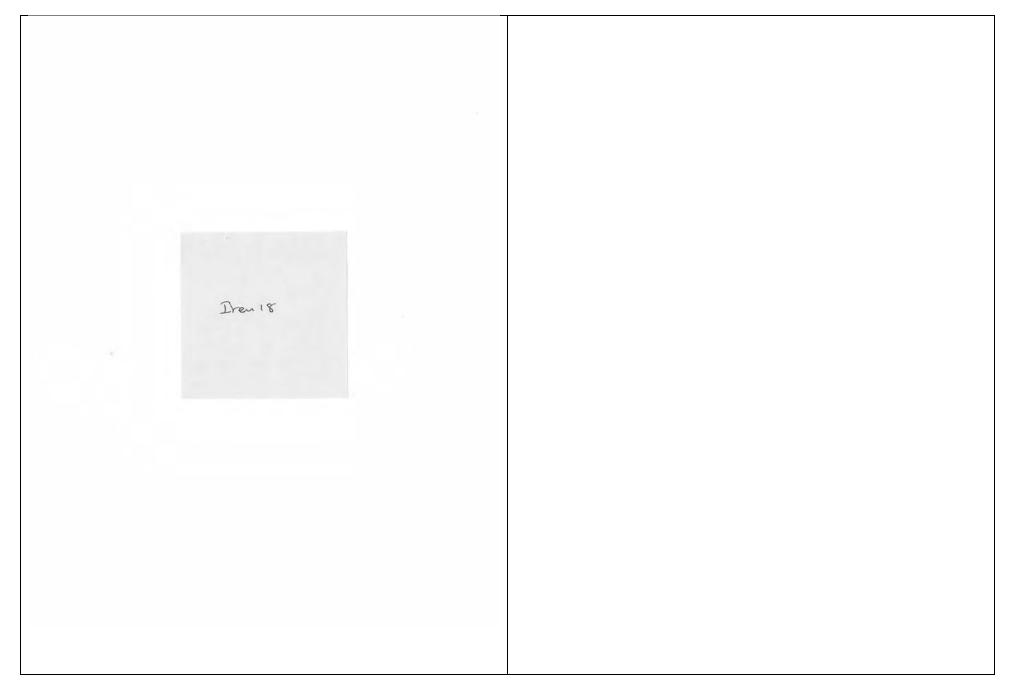
- One of the first, if not the first, true "net-zero energy" biological research laboratories in the world, generating 100% of its power on site (solar power).
- Use of natural day lighting and views, natural ventilation/passive cooling, rainwater harvesting, militie low-mater landscaping, use of regional materials, green crofs, recycles/content, sustainably harvested wood.
- Rabifall runoff from the building rooftop will be stored in cisterns to provide water for impation, cooling towers, and washing presovoltaic banels.
- Roof gerdens featuring flowering trees, shrubs, grasses and succulents will be installed on the tired terraces to help shade and coal the building.

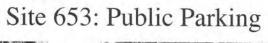
Researchers in the facility will be engaged in some of the most exciting areas of genomic research instuding ruleme generations, and environmental genomics. Specific programs currently underway footh by 15VI researchers are main in collaboration with USSD, S1O, Salk, and other area researchers/research organizations) area environmental metagethemics research to find, catalogue and better understand the innerseas to the programs of the innerseas to the salk environmental and human bedty, research applying synthetic follogy advances to microbes to the paske environmental and human health problems; improving techniques developed at XVIV to sequence the genomes of individual cells. The personal perso

http://www.jcvi.org/cms/press/press-releases/full-text/article/j-craig-ve...-breaks-ground-on-la-jolla-californias-first-true-sustainable-laborator/

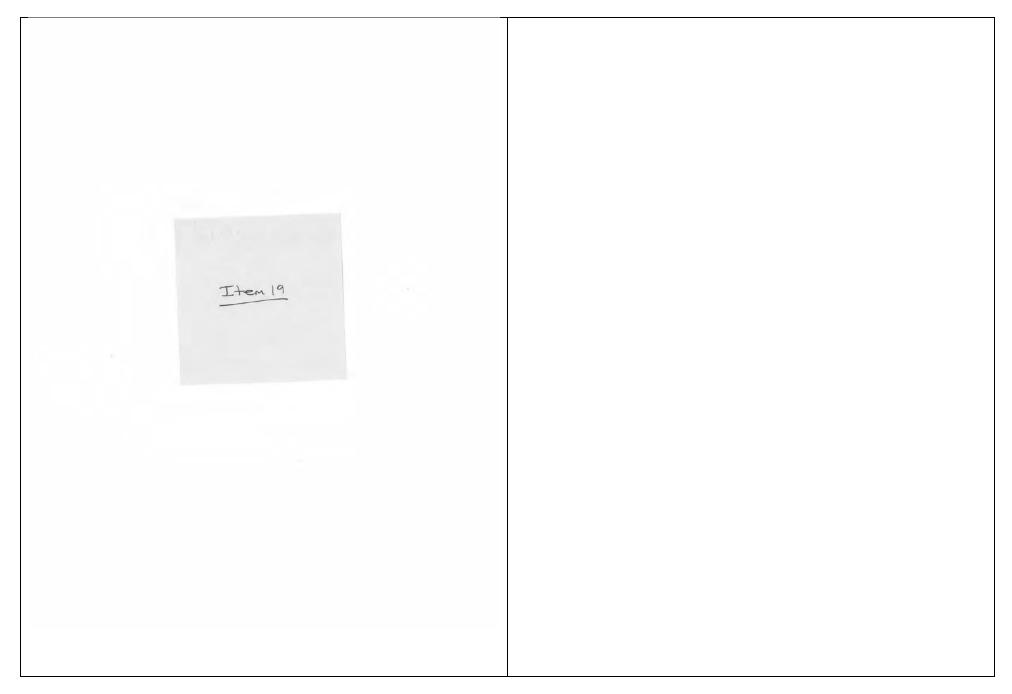
age 1 of 2

JCVI: J. O	Craig Venter Institute Breaks Ground on La Jolla, California's First True Sustainable Laboratory Facility	2/26/13 4:43 PI
research	VI currently has two facilities—a temporary facility near the UCSD campus with 60 there and the east coast headquarters in Rockville, MD with approximately 240 as and staff.	
design a Engineer	my Building Companies is the general contractor. Uther companies involved in the and construction of the JCVI building are:, Integral Broup / IDRAS, RPFF Consulting ers, Jacobs Consultancy, Androsopon Associates with David Recel, Landscape cts, Cavad Mikhor & Associates, Sci Engineers, Inc., and Sharkhadie Social, Inc.	
The JCVI to the et society, policy in scientist transform genomic ary state the Edn, ICVI is a later than the ICVI is a l	It the I. Craig Venter Institute (ICVI) VI is a not-far-print research institute in Rockvilla, MCI and Sain Diego, EA dedicaced advancement of this sizence of genomics), the understanding of its invalidations for and communication of those results to the science of sommunity, the public, and indices. Founded by I. Craig Venter, in D., the ICVI is home to approximately 300 as and soft with expertise in human and evaluationary biology, genetics, interactional specific present, and public doubtion in Science. The large can determine the picty research, and public doubtion in Science, The large calculations of the ICVI are: The Institute for Centeria, Research, 1756, 17th Science in Scie	
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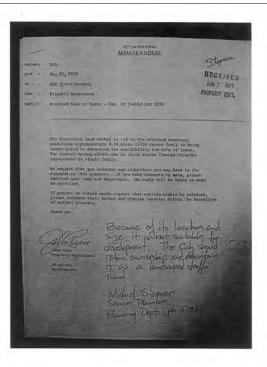






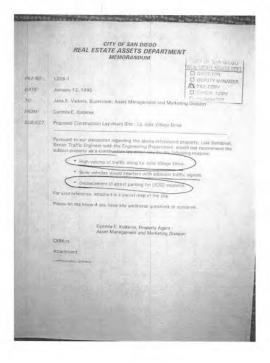
Historical perspective.

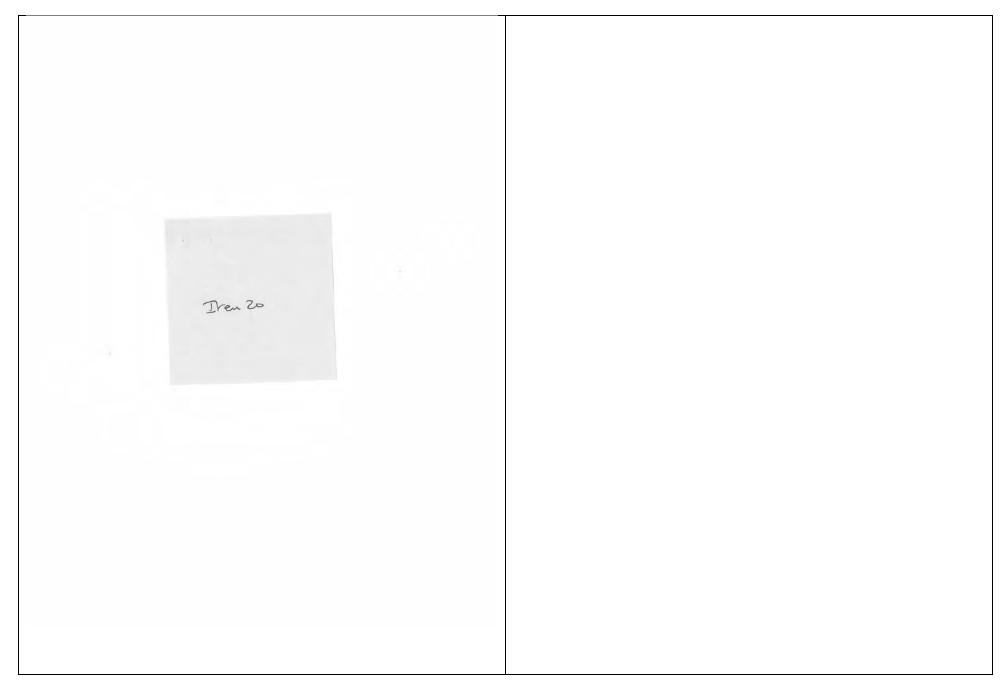
19.9.



Why the change?

196.







Page 1 of

Stricker, Dan

From: Hopkins, Gregory

Monday, August 25, 2008 8:06 AM

Stricker, Dan; Weston, Don; Aguilar, Adolfo

Lindsay, Stephen; Strohminger, Jeff; Broughton, Kelly; Sherwood, Allison; Qasem, Labib Cc:

Subject: RE: Hillel site access

If the owner the lot relinquished the access rights along La Jolla Scenic Way via a map or drawing, I can record a document that revests the access rights along a portion of the road if it makes sense safety wise, etc. We can talk about it in more detail it needed.

Gregory P. Hopkins, PLS Senior Land Surveyor Deputy City Engineer Development Services Department City of San Diego Office: 619.446.5291 Fax: 619.446.5499 ghopkins@sandiego.gov

From: Stricker, Dan

Sent: Friday, August 22, 2008 3:18 PM

To: Weston, Don; Aguilar, Adolfo

Cc: Lindsay, Stephen; Strohminger, Jeff; Broughton, Kelly; Sherwood, Allison; Qasem, Labib; Hopkins, Gregory

Subject: Hillel site access

We have received a memo and a fax regarding a limitation of site access to the Hillel site. I have scanned and attached both the Fax from Sue Moore that Kelly received, and the memo that Allison Sherwood received from 5 Clive Granger. Both documents refer to 30 year old city documents which discuss curb cut and access restriction to the Hillel site. The documents discuss restrictions from La Jolla Scenic Way to the site, which is the applican proposed site access location. Were these restrictions simply department policy at the time, or did an 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 it have something to do with the City being the previous owner of the site? Did the City as prior owner of th Hille! (the vacant portion of the project site) relinquish access rights to La Jolla Scenic Way on a map or a stree dedication drawing? Base maps or the subdivision maps which dedicated the streets might show it. Those can be found in the legal description - I think 1299 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 sir the City owned the site back then. If the rights were officially relinquished and recorded, we might be able to a a "vacation action" at this hearing to reverse (remove) the relinquishment, and take care of it all at the pending hearings for the project.

Jeff Strohminger 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 Labib next week to discuss after the research completed.

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 08, 2008 3:05 PM To: Stricker, Dan Subject: FW: Hillel parking garage access, Project No. 149437 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 9:46 AM Cc: Broughton, Kelly; Strohminger, Jeff; Sherwood, Allison; Qasem, Labib Subject: RE: Hillel parking garage access, Project No. 149437 In again reviewing Sue Moore's fax, although the general concern (site access) was the same, the questions asked are somewhat different from those asked by Pat Granger (and answered) when Labib and I met with her on August 6. Sue's questions are more focused an 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 DSD policy. Let me know if meeting with Labib and I would help. 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: Lindsay, Stephen Sent: Thursday, August 21, 2008 7:11 AM To: Stricker, Dan Cc: Broughton, Kelly; Strohminger, Jeff; Sherwood, Allison

Page Lors

Stricker, Dan

From: Stricker Dan

Sent: Monday, Saptember 08, 2008 3:43 PM

To: Sherwood, Allison

Cc: Casem Labib: Hopkins Gregory: Aguilar, Adolfo Subject: RE: Hills! parking garage access, Project No. 149437

Abutter's 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 to and beef up the following before it gets put into any response letters.

Given the current classification of La Jolla Village Drive as a <u>(Major?)</u> 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 on their PROW Vacation exhibit, and should we include some language in the Vacation Reso? I do believe that Adolfa is going to provide me with that language, no?)

Labib also mentioned having the applicant relinquish a portion of their access rights on La Jolia Scenic Way, where the project proposed to take their access. Labib's thoughts were to allow access to the site on La Jolia 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 Jolia 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 Jolia Scenic Way:

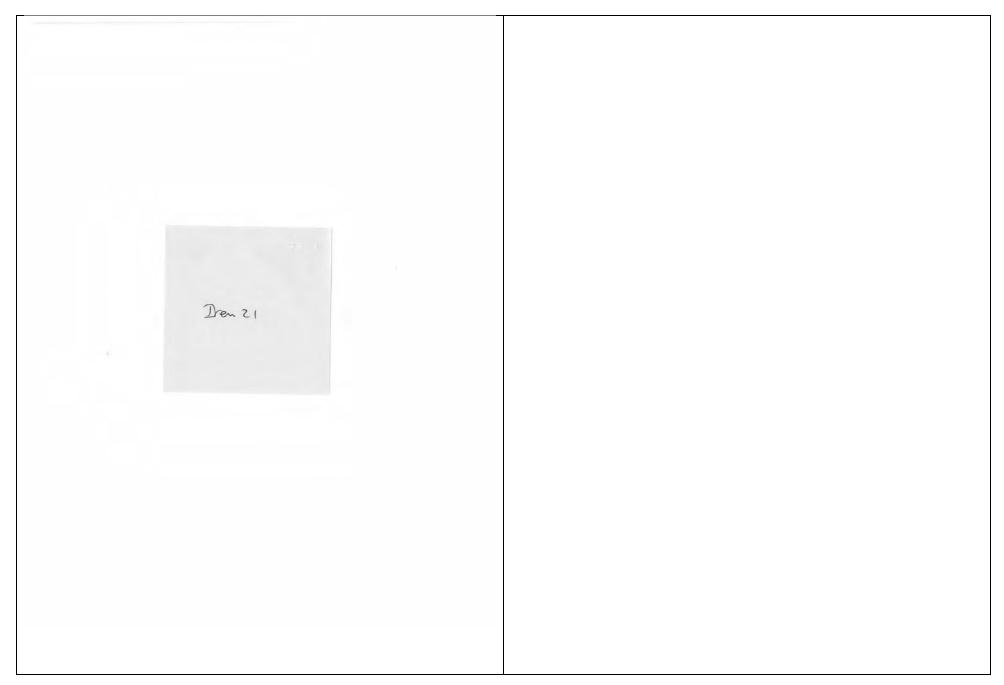
- Site Access. There are a number of reasons that the applicant has chosen to access the site from La Jolla Scenic Way, including the following:
 - 8. Community opposition to access for cars and pedestrians from La Jolla Scenic Drive.
 - b. Access from La Jolla Scenic Way would require a longer driveway to meet city driveway slope regulations, and wouldn't allow for the number of parking spaces that the project is providing.
 - Placing the driveway of the low side of the site makes for the shortest driveway possible, especially given the cutting into the land necessary to provide underground parking.
 - d. Access from La Jolla Scenic Way results in more on-site open space.

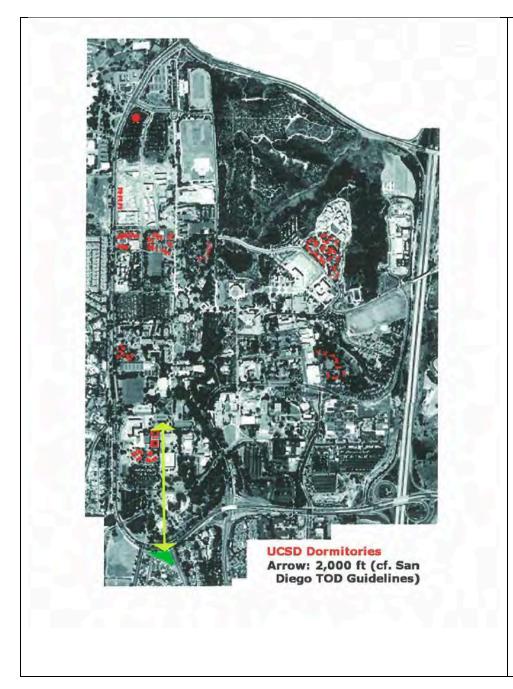
Labib - please provide us with some additional information here: i.e., why are we in support of access off La Jalla Scenic Way, and why are we proposing the relinquishment of a portion of La Jalla Scenic Way?

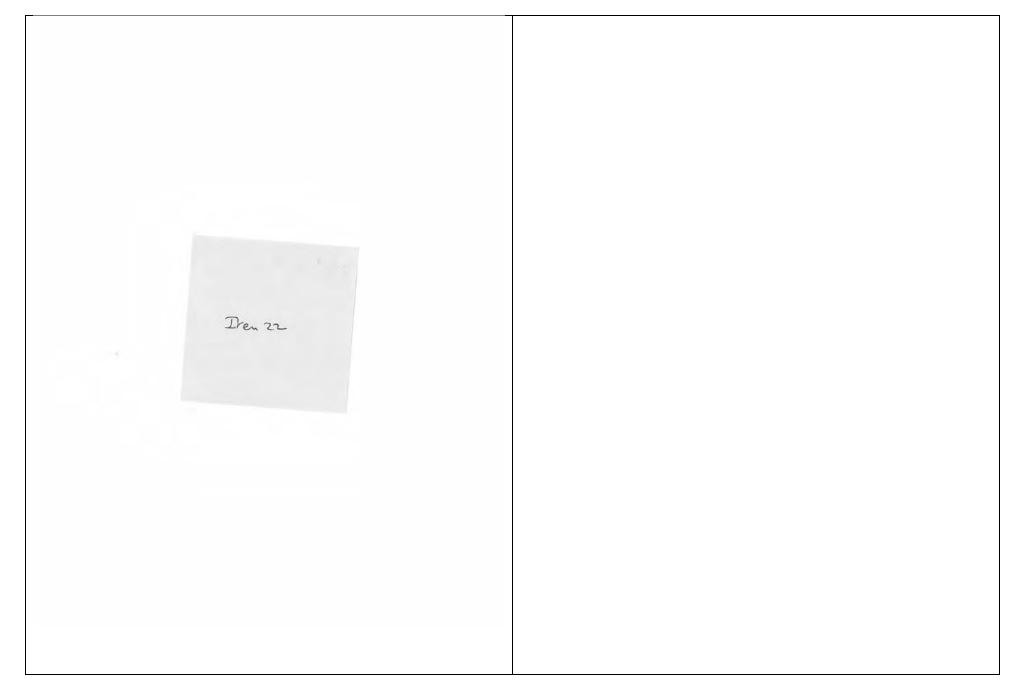
Thanks

Daniel Stricker

Development Project Manager Affordable/Infill Housing & Sustainable Buildings Expedite Program Clty of San Diego Development Services Department







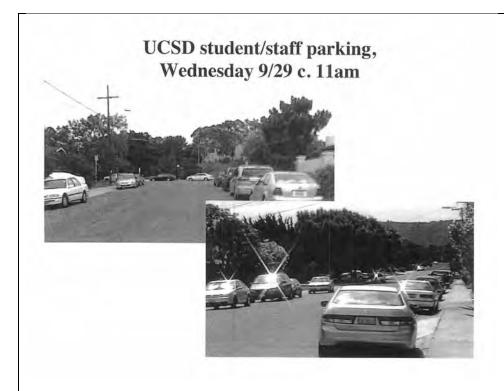
Site # 653 Parking - weekday c. 11am



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.

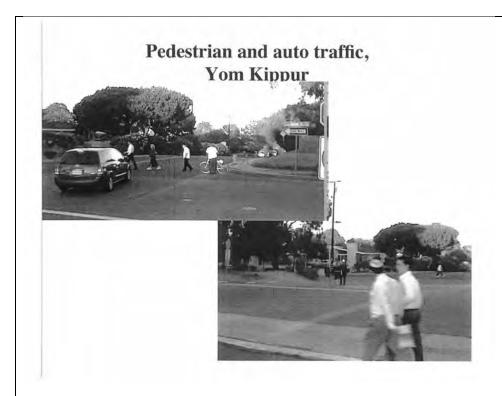


Daily parking impact LJ Scenic Drive.



Parking around Site 653





Parking along LJSN, Yom Kippur

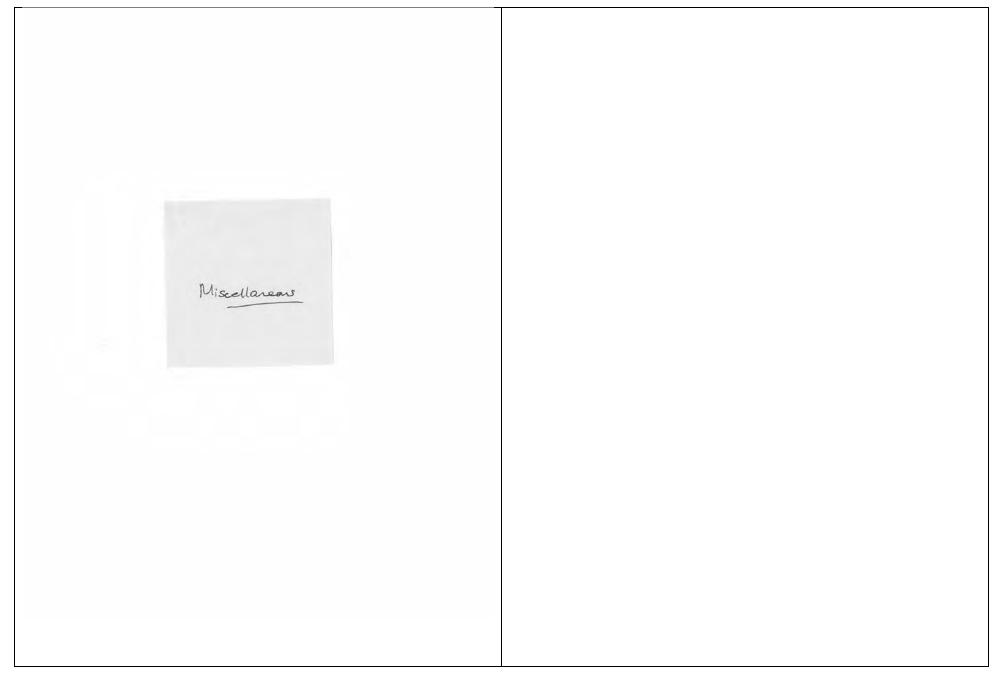






Item 23	

Page 1 of 2 Stricker, Dan From: Henegar, Lesley Wednesday, September 24, 2008 11:01 AM Stricker, Dan Subject: RE: LU Designation Area west of the Hillel 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 Hillel site I need to include something about LU Designation in the project data sheet. Da I just say none since it's under the control of the state? The La Jolla CP LU map shows it as Just white, whereas the University CP 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/ From: Henegar, Lesley Sent: Tuesday, September 23, 2008 3:58 PM To: Stricker, Dan Subject: RE: LU Designation Area west of the Hillel site There was no aerial attached. But, the land to the west of Torrey 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



Vi

Stricker, Dan

From: Sent:

Lewis, Larry

Wadnesday, September 24, 2008 8:55 AM

Subject:

Stricker, Dan

RE: Hille! # 149437

12,100 se Rees

Ok, they may need to exit 85 people from the garage and 881 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. Closes we ever get to an

----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 subterransan 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 parked 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.5. 501

San Diego, CA 92101 (619) 446-5251

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 aga I recycled the plans

RTC-429

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: FW: Hillel # 149437 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) 446-5251 Please visit our website at http://www.sandiego.gov/development-services/ ----Original Message----From: Medan, Bob Sent: Tuesday, September 23, 2008 10:14 AM Toi Stricker, Dan Subject: RE: Hillel # 149437 Dan, occupant load is calculated by the structural plan checker. It is not part of the fire review, ----Original Message----From: Stricker, Dan Sent: Sunday, September 21, 2008 5:17 PM To: Medan, Bob Subject: Hillel # 149437

Stricker, Dan

From:

Lewis, Larry Wednesday, September 24, 2008 7:33 AM Stricker, Dan

RE: Hillel # 149437 Subject:

Sorry I can not

They don't have the square footages, there is only I 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 calculates, 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: Hille! # 149437

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) 446-5251

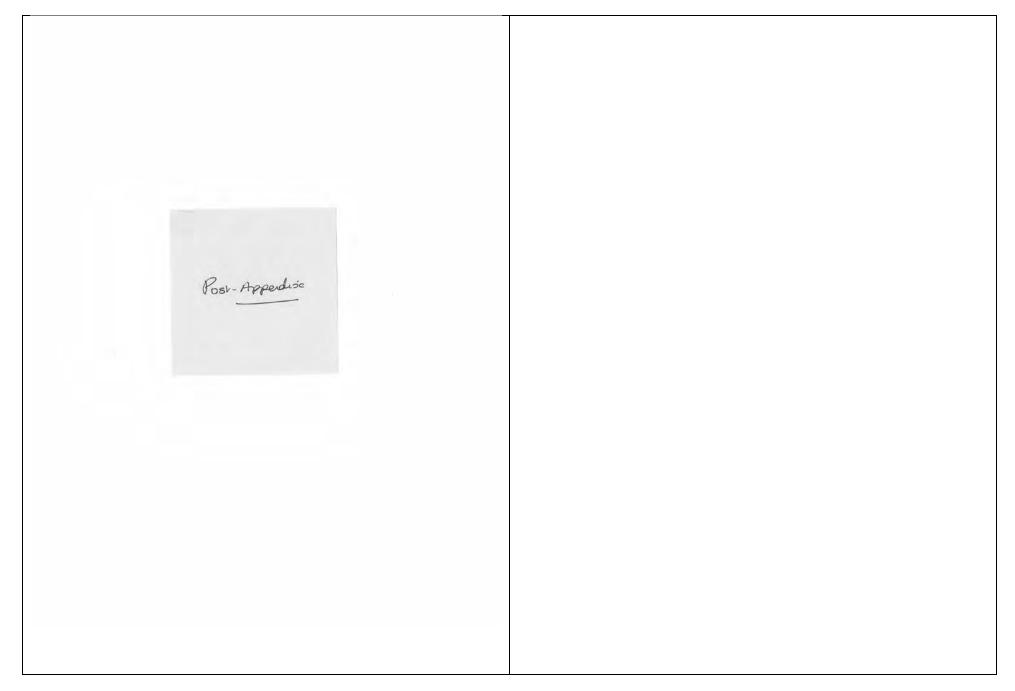
Please visit our website at http://www.sandiego.gov/development-services/

----Original Message----From: Medan, Bob

Sent: Tuesday, September 23, 2008 10:14 AM

To: Stricker, Dan

Subject: RE: Hillel # 149437



COUNCIL POLICY

SUBJECT: POLICY NO:: **OPEN SPACE PRESERVATION AND MAINTENANCE**

POLICY NO.:

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, 1968, 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, 1973, 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 \$65 million in general obligation tonds to purchase open space properties for the City Preparatory to the passage of Proposition C, the City Council adopted an ordinance establishing the San Diego Open Space Park Facilities District 1, which has boundaries coterminous 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 Specufic Plans. This system forms the basis of the City's Open Space preservation efforts.

Open Space - Non-Designated

Non-Designated Open Space as herein defined consists of areas adjacent to Designated Open

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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.

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 identifies 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-259663). 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 lists' 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 received 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.

Retention of City-owned Lands

City-owned properties identified as Designated Open Space shall be retained in City ownership for Open Space purposes.

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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 encumbered 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 fund 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 a 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 fee 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 fee title to Non-Designated Open Space or Sensitive Lunds 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 with to donate land to the City for preservation as Open Space. The City's policy governing the acceptances of such donations is found in Council Policy 600-31.

e. Property Exchange

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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 22,0902.2.

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.

h. 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 "lotted 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 floodway or floodplain, as appropriate, Hillside Review, agriculture, or large-let 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 guide the City's maintenance program. Positive Open Space easements shall also be shown on this list.

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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 Positive 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 similar to that required by law of private owners of undeveloped property, i.e., primarily litter abatement and control of fire bazards.

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 the above services may or may not be completed and are subject to budgeting and the availability of finds.

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 the criteria of resource-based parks.

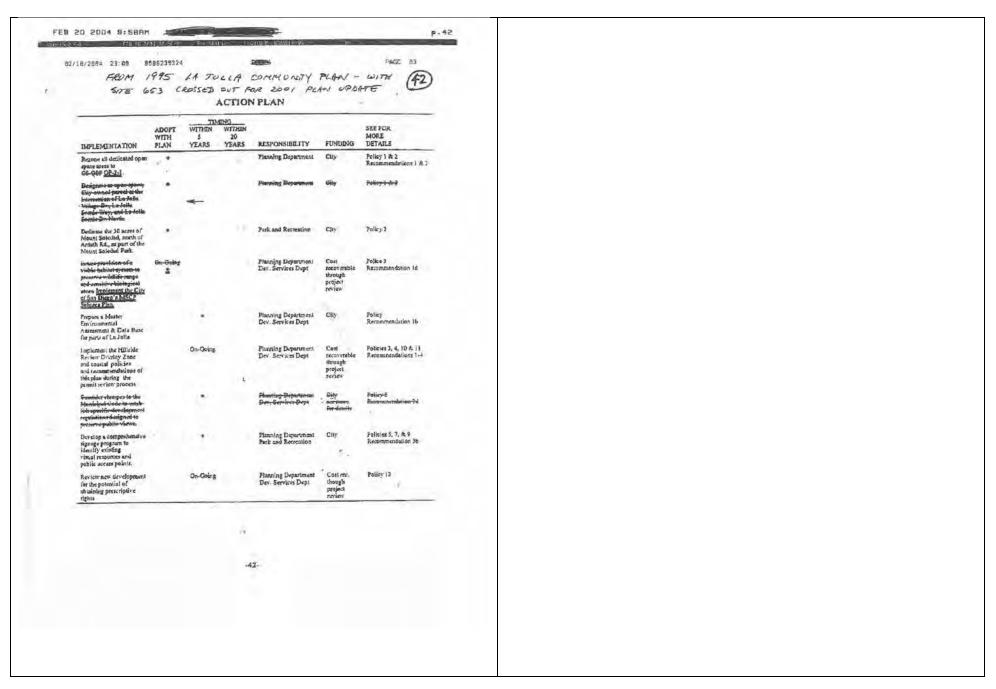
The City policy on dedication of Open Space lands for park purposes is covered in Council Policy 700-17.

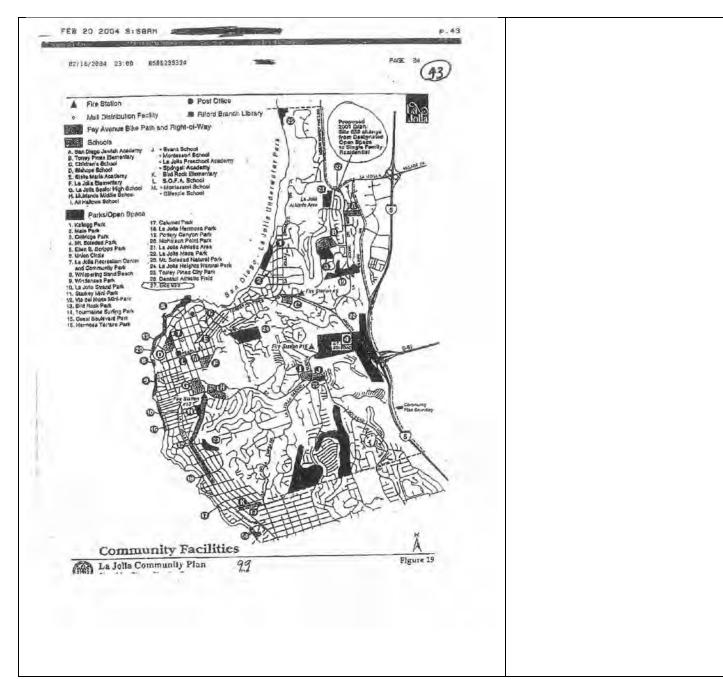
CROSS REFERENCE:

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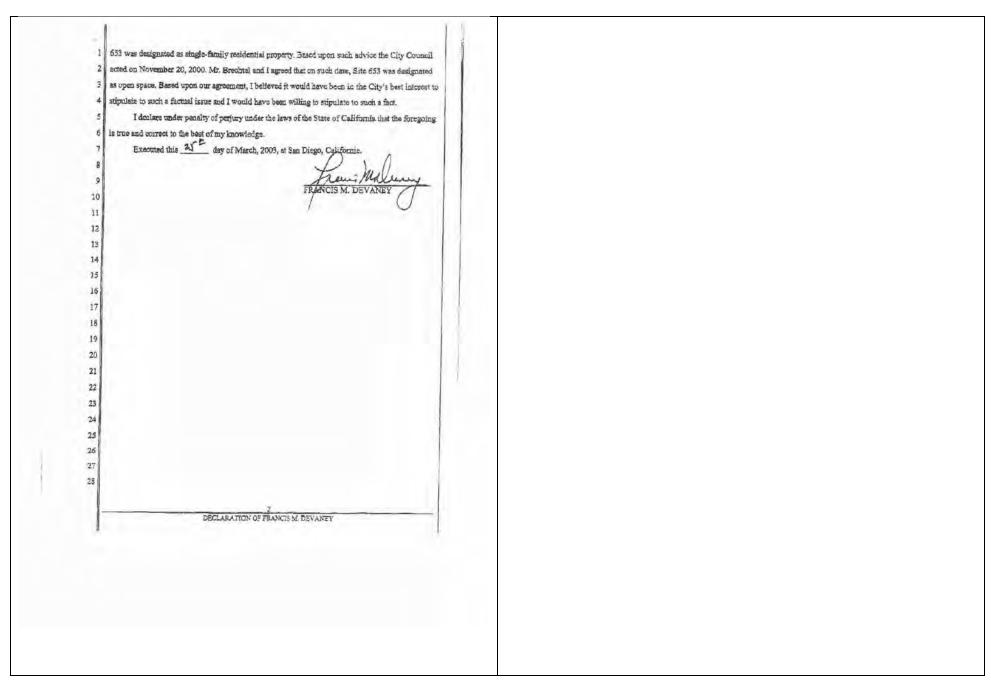
Page 5 of 6

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	COUNCIL POLICY	
Council Policy 700-10 Council Policy 700-17 Council Policy 600-31 City Charter Sec. 55		
HISTORY:		
Adopted by Resolution R-2160 Amended by Resolution R-2548 Amended by Resolution R-2621	010 05/19/76 869 08/24/81 130 12/11/84	
CP-600-23		
	Page 6 of 6	





5 San Diego, Telephone:	City Attomey TE, Assistant City Attorney Deputy (SBN 147126) OZA, Deputy (SBN 182539) Deputy (SBN 212439) be City Attorney ion Avenue, Suite 1100 California 92101 (619) 533-5800 (619) 533-5802 ondents CITY OF SAN DIE				
the second secon	Attorneys for Respondents CITY OF SAN DIEGO and CITY COUNCIL OF THE CITY OF SAN DIEGO				
9	SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO CENTRAL DIVISION				
16 LA JOLLA HIGHL HOMEOWNERS, 8	ANDS	Case No. GIC 762557 UC Judge: Hon. Wayne L. Peterson Dept.: 75			
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13 va.		DECLARATION OF FRANCIS M. DEVANEY IN OPPOSITION TO			
14 CITY OF SAN DIE OF THE CITY OF S 15 DOES I through 25.	GO; CITY COUNCIL SAN DIEGO; and , indusive	PETITIONER'S MOTION TO DETERMINE FEES AND COSTS OF ADMINISTRATIVE RECORD			
16 Resp	ocudents.	Hearing Date: April 4, 2003			
17 HILLEL OF SAND	TEGO a zon meste) Time: 3:00 p.m.) Writ Filed: February 16, 2001) Trial Date: April 7, 2003			
16 corporation, and DO	DES 26 through 50,	Iner Dete. April 1, 2003			
19 Real P	Party-In-Interest				
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	Devaney declare and state:	The second of th			
22 1. June 23 California	an attorney duly scensed to	practice before all of the courts of the State of			
	semilored by the Office of E	he City Attorney, Civil Division, and I have			
		representation of the City on this matter. During the			
The state of the s		syne Brechtel, who represented the Petitioner, on			
27 several occasions, D	turing the course of these con	nversations, I made clear to Mr Breshtel that the			
28 City agreed with his					
	DECLARATION OF	FRANCIS M. DEVANEY			
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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. Report to the Planning Commission No. P-00-054, La Jolla Community Plan Update Informational Workshop.

2. Report to the Planning Commission No P-00-219, 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 rezones and the associated amendments to the Progress Guide and General Plan as well as recommending consideration of the Addendum LDR No. 40-0747 to EIR DEP No. 92-0199 and recommending recission of the currently applicable Policy documents listed below?

Staff's Recommendation -

- Recommend Consideration of Addendum LDR No. 40-0747 to Environmental Impact Report DEP No. 92-0199 (Enclosure 1);
 2 Recommend Adoption 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 Jolia Public Facilities Financing
- 4. Recommend Recission of the 1967 La Jolla Community Plan (amended in 1976 and 1988), the 1972 La Jolia Shores Precise Plan (amended 1976), the 1983 La Jolia - La Jolla Shores Local Coastal Program, the 1995 La Jolla Community Plan, and the 1980 Fay Avenue Plan;
- Recommend Adoption of the proposed rezones as shown on Zone Map Nos. B-4170. B-4174, C-914 and the proposed amendments to the La Jolla Planned District Ordinance (see Attachment 1).





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 jevels 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 ether 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 rezones to implement it. The 1995 LJCP was reviewed 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 (CCC) 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 2001 draft community plan update represents a consolidation of the 1975 and 1995 La Jolla Community Plans, the La Jolla Shores Precise Plan, the La Jolla Shores Local Coastal Program and other documents.

After receiving a CCC grant in January 2000 for the purpose of updating the La Jolla Community Plan, City staff held an Informational Workshop with the Planning Commission on March 23, 2000 to identify the plan issues to be addressed. At that time, the Planning Commission identified no specific issues. Staff has worked with the La Jolla Community Planning Association (CPA) in the context of presentations at their regularly scheduled monthly meetings and has held three meetings with the planning group Plan Opdate 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 view easements. These concerns were raised in 1995 and the CPA has not wavered 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
were sent to approximately 170 persons 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

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application and implementation as well as Multiple Habitat Planning Area (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 Scenic Drive North.

City staff has reviewed this site, which was redesignated 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.

Past City Council action has directed staff to retain this site as an income-producing property.)

Staff is therefore proposing a redesignation 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, it fact, it had changed to open space with the Council approval of the 1995 Plan. This 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 Cityrecognized groups (the La Jolla Community Planning Association (CPA) and the La Jolla Shores
Advisory Board) have voted unanimously to retain Site 653 as open space. A letter reflecting the
vote from the La Jolla CPA is included as Attachment 3 to this report. In that letter, the La Jolla
CPA states their desire to classify the lot to 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
bearing.

B. Coastal Access Subarea Mana 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 Subares maps

C. <u>Cultural Complex Boundary:</u> Change the boundary to include the La Jolla Recreation Center and the Bishops 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 Bishops 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, Bishops School and Scripps Clinic (being developed as residential) as important components of the cultural life of La Iolla, staff has identified these

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PLANNING COMMISSION RESOLUTION NO. 3206-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 PACILITIES FINANCING PLAN, ADOPTION OF PROPOSED REZONES AND AMENDMENTS TO THE LA JOLLA PLANNED DISTRICT ORDINANCE, RECISSION OF CURRENTLY APPLICABLE PLANS,

WHEREAS, on November 8 and December 6, \$001, the Planning Commission of the City of San Diego held a public hearing to consider recommending adoption of the Draft La Jolla Community Pian and related actions; and

AND CONSIDERATION OF ADDENDUM LDR NO. 46-6747 TO EIR NO. 92-0199

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

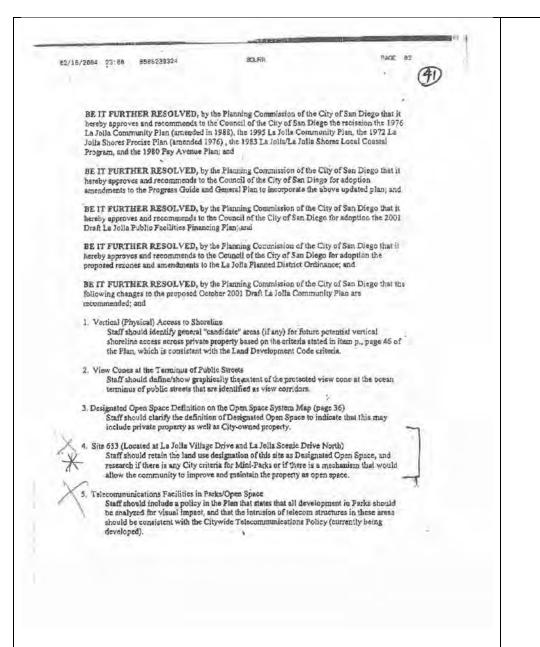
WHEREAS, the physical build-out of the community of La Jolla has changed significantly in the intervening years since the last Community Plan update, and

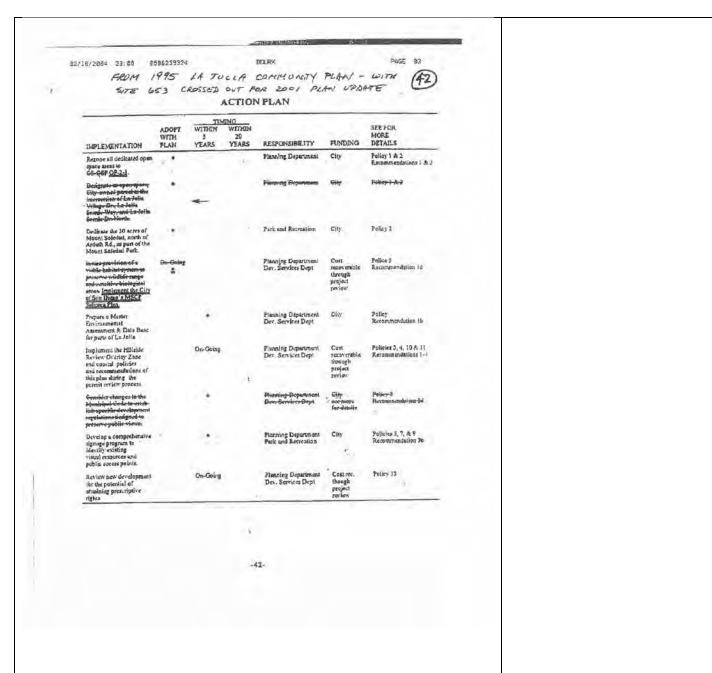
WHEREAS, the Planning Commission of the City of San Diego considered all testimony and evidence; NOW, THEREFORE;

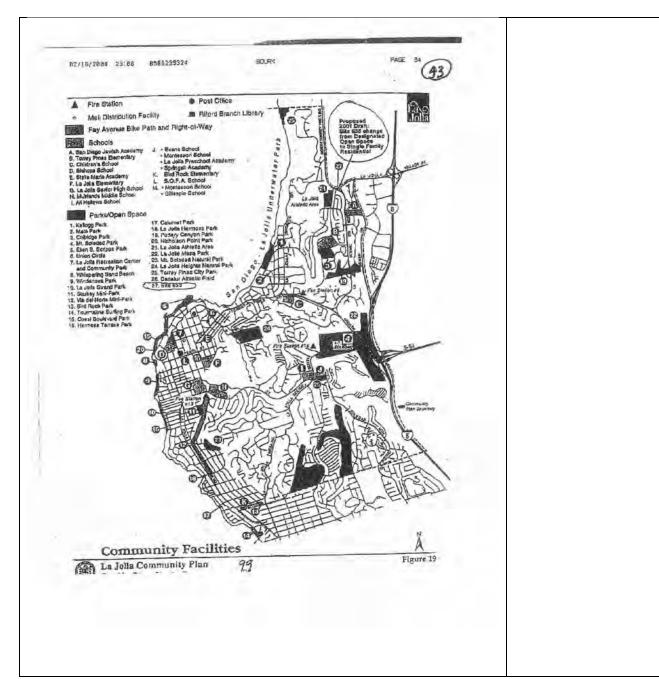
BE IT RESOLVED, by the Planning Commission of the City of San Diego that it hereby approves and recommends to the Council of the City of San Diego for certification that the information contained in Addendum LDR No. 40-0747 to Environmental Impact Report (EIR) No. 92-0199 has been completed in compliance with California Environmental Quality Act and State CEQA Guidelines, that said EIR reflects the independent judgement of the City of San Diego as Lead Agency and 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







After the City Attorney has Sira legal advice that the process is not

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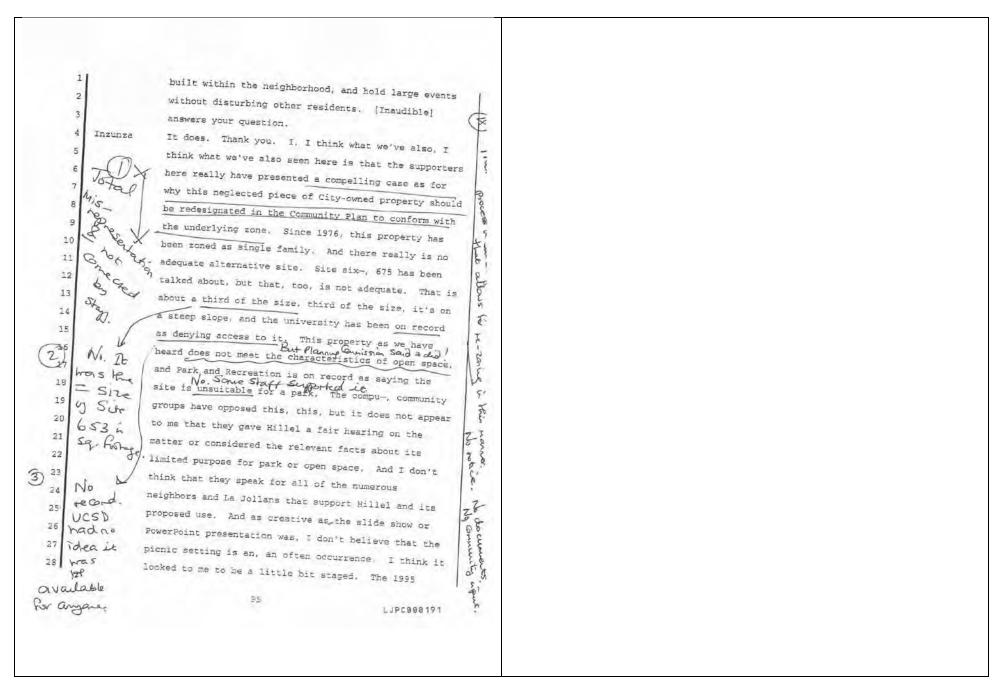
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involved, so they would be able to have more families coming together. And my task was to work with several rabbis in San Diego to help set up an air-route boundary. And an air-route boundary, for those of you who, who might not know what this is, is, is a symbolic demarcation. And it is set up in a manner so that those people from the orthodox Jewish faiths 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 SDG&E 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 a organization that

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No. Only prohibition on permanent has to go out and lock for a site off UCSB. They have 1 2 a legal requirement to look for a site off the campus. 3 They're gonna work with the students at UCSD. They're gonna work with students all throughout San Diego. And it is a larger, the larger issue for all of us 6 here. But I think what is interesting is that some of the fears that maybe some people in the community 8 have, that there is going to be lots of noise, that this is going to be turned into a, maybe some sort of 10 fraternity house, sorority house. That there's gonna 11 be all sorts of students going back and forth and, and 12 disrupting the neighborhood and so forth. And I find 13 that just not to be true. And, and what I'd like to 14 do, if possible, is I'd like to call up David Singer 15 to possibly talk about his experience with the Hillel 16 at UC Berkeley and what it is that they've been able 17 to do in terms of partnering up and, and working with 18 the neighborhood. 19 My name's David Singer. I, I'm a, live in San Diego, Singer 20 go to UC Berkeley. I'm an active leader at the Hillel 21 organization up there. And I can tell you that any 22 claim that it is a disruption to the community is 23 absolutely false. We hold events there every single 24 night and every single night, if you walk past the 45 PSO 25 building, you cannot hear a sound coming out of it. 26 There is sound inside, but it is quiet outside because 27 everything there is held with respect and the building 28 itself is built in a manner that allows for it to be 94



No. The designation was Mis-represented & Start duchit is Community Plan designation of site 653 was considered by Council November of 2000, when it did approve 3 exclusive negotiations with Hille! as noted by the record. The acreage of open space and parks in this 5 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 9 recreational acreage is greater than that of most 10 communities in this City. I believe that Hillel of 11 San Diego has shown their ability to be sympathetic to 12 the concerns of the immediate neighbors by designing $\boldsymbol{\epsilon}$ 13 project that will mitigate its impacts and to provide 14 generous landscaped areas, all at great expense to 15 this non-profit agency, even though these same 16 neighbors have continually refused to meet with Hillel 17 to discuss their issues. There is significant A one time 18 economic benefit to all the citizens of San Diego by Sale 19 generating revenue from a remnant parcel that has been w/no 20 an economic burden to the City for close to 40 years. tax 21 The other campus ministries that have facilities near revaux. 22 UCSD have demonstrated their ability to be good 23 neighbors, and Hillel will be one, too. Students at 24 these other facilities have been able to walk across 25 the street from the campus to attend, to their 25 organizations of faith. As has been, as has been 27 eloquently demonstrated today, the Hillel students are 28 an asset to the City of San Diego, and they have

96

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 fif-, site 653. And I'd like to 10 read this into the record. My motion would be to 11 designate [BREAK IN TAPE] [TAPE OVERLAP NOT 12 TRANSCRIBED] as low-density residential the City-owned 13 parcel known as site 653 at the intersection of 14 La Jolia Village Drive, La Jolia Scenic Way and 15 La Jolla Scenic Drive North. If the adjacent cul-de-16 sac and excess right-of-way on La Jolla Scenic Drive 17 North are vacated or otherwise made available for 18 inclusion in the development of site 653, site 653 by 19 the City of San Diego, then development of it and site 20 653 shall be viewed in the context of a single-21 development plan, and shall be consistent with the 22 permitted uses and development regulations of the 23 single-family zone of the La Jolla Shores Plan 24 District Ordinance. In addition, if the adjacent cul-25 de-sac, cul-de-sac and excess right-of-way on La Jolla 26 Scenic Drive North are vacated or otherwise made 27 available for inclusion in the development of site 28 653, any development will provide for landscaped open

	4	
1	space in an aggregate area of not less than 10,000	
	square feet. And I think what this does, it really	
1	does set	
Madafer	Second,	
Inzunza	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 so	
	work with one another in order to prosper and better	
E-74	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 to 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. T think ?	
	the first time around both sides there was a little	
	nyperbole. And I also want to thank Mr. Inzunza	
Vo -	because his predecessor on this issue said some things	
00	that I think unnecessarily riled up some people and	
6.	in particular, I want to thank you for the tone. He's	
4 %	kind of carried the ball for Hillel on this, and I	
0)	think he's done it respectfully. I want to say, also,	
	that I, I, I think both sides present a righteous	
E'E'E	position in this case. I don't think that there's,	
1.86	98	
	7.55	

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 Korch, project manger 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 perusal" 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	
	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?	
	A COLOR OF C	
I		

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 6098) is slated to be considered as a Closed Session real estate item prior to the *penciled 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) 450-6758 sue@mind.ucsd.edu

Letter AJ

Project No. 212995 Hillel Center for Jewish Life

3/11/13

AJ-1

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 8, 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 AJ-1 The comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No additional response is required.

Letter AK

Project Number: 212995

Project Name: UCSD Hillel Center for Jewish Life

Email submission, March 11th, 2013

Ms. E. Shearer-Nguven:

Please add these comments to the hard copy response to the above project submitted by Sue Moore.

Thank you.

AK-1

Throughout my project DEIR response I have commented upon the use of the house at 8976 Cliffridge Avenue, La Jolla, CA 92037. As DSD is well aware, its use has been supported by the UCSD administration, to the extent that UCSD has provided a shared parking agreement (see earlier comments). The residents who have opposed the development to the Hillel Center for Jewish Life have repeatedly asked for clarification from the City as to the relationship between UCSD and the Hillel Center for Jewish Life (there have been several names over the years). This section from the UCSD LRDP response should be taken into consideration by the City as a policy statement from UCSD. Further, UCSD's support of a shared parking agreement with Hillel of San Diego of a non-conforming use within the LJSPDO should be considered in relation to the statement below. It has been the relationship with UCSD and the support from its former chancellor that allowed a Hillel of San Diego preferential status in the RFP – however, such personal support should not be permitted to override policy and planning.

"This comment discusses existing projects conducted by non-University parties occurring in residential areas outside of the jurisdiction of UCSD. The projects discussed are not part of the proposed project analyzed in the Draft EIR and thus are beyond the scope of the Draft EIR. In addition, these off-campus projects have not been endorsed or approved by UCSD. As discussed in Section 4.8.3.2 of the Draft EIR, the City of San Diego has jurisdiction over activities occurring on nearby non-University property, and has the authority to enforce penalties against activities occurring in these areas that do not conform to the City of San Diego Municipal Code."

Taken from the University of California San Diego, Long Range Development Plan, 2004, DEIR responses.

Thank you, Sue Moore AK-1 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
	From: Sent: To:	mary mosson ≤marymosson@hotmail.com> Thursday, March 07, 2013 1:24 PM DSD EAS	
	Subject:	Project Name: UCSD Hillel Center for Jewish Lif 2010101030	e, Project Number 212995/SCH Na
AL-1	place across La Joll	te neighborhood which would be directly impacted by the Village Drive from UCSD. The small tract of land on	which the student hangout would be
AL-2	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 huge Venter Institute is burgeoning just to the west. Incredibly, the plan is to narrow La folla Scenie Drive by two feet! Traffic in our area should be sheltered from the huge amount on Torrey Pines Road and La Jolla Village Drive, but instead, drivers have discovered they can detour through our		
AL-3a	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-3b	Village Drive at the	hat one of five students will drive to the new activity far heavily trafficked intersection with Torrey Pines Road, n dark clothingat nightdangerous!	
A I . 4		rhood is being hombarded. There is a safe pedestrian o	verpass from the University to the
AL-4	Hillel has insisted of	n this triangle in a totally residential area. It is an inapp open space. Let's preserve a few places in San Diego v	propriate use of the land, which

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 AL-4 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 **RESPONSE** In regards to the comment that the project site be "dedicated open space," 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.

Letter AM

Walter H. Munk Mary Coakley Munk 9530 La Jolla Shores La Jolla, CA 92037

Ms. E. Shearer-Nguyen Environmental Planner 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. 212995

Dear Ms. Shearer-Nguyen,

Thank you for providing the Re-circulated Draft EIR for the subject project, previously known as Hillel of San Diego Student Center II. It is impossible to navigate such a document without a legal background. Therefore, we will address a common sense issue that, in and of itself, should negate any further consideration of this project...TRAFFIC!

- AM-1 AM-2
- We are extremely concerned about the impact the proposed project will have on our community. The traffic in the area is so dense that the corner of Torrey Pines and La Jolla Village Drive is a bottleneck much of the day. The new Venter Institute has NOT been taken into consideration for the increased traffic it will bring to the intersection, nor have the other buildings that will be located on that same piece of land in the future. The neighborhood provides the perfect shortcut to avoid the corner of Torrey Pines and La Jolla Village Drive. Many already use it.
- AM-3 We already deal with an impossible parking dilemma. Please be mindful of the community in your decision making process.

Sincerely,

Walter Munk

hann

Mary Coakley Munk

AM-1

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.

AM-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.

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).

AM-3

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

AM-3 (cont.)

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.

AM-3 (cont.)

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 onstreet 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.

Letter AN

From: Charles Perrin < chasperrin@yahoo.com>
Sent: Friday, March 08, 2013 3 48 PM

To: DSD EAS

AN-4

AN-5

AN-6

AN-7

Subject: Project Name: UCSD Hillel Center for Jewish Life Project #212995 / SCH # 2010101030

Attn. E. Shearer-Nouven, Environmental Planner PLEASE ACKNOWLEDGE RECEIPT

AN-1

Since 1966 I have lived at 8644 Robinhood Lane, two and a half short blocks from the site of the proposed student center. I have been a supporter of Hillel. My wife and I were married at the Harvard Hillel Center, I used to contribute annually to Hillel Foundation, I have participated in Hillel events at UCSD, and I will be proud of a UCSD Hillel at a suitable location. Nevertheless, I am opposed to this project because of the intrusion of such a large operation into a single-family residential area, and because of the impact on traffic, parking, and noise.

AN-2

One goal of HCJL is to "provide a permanent religious space ... which, because of separation of church and state issues, cannot be built on the UCSD campus" (DEIR p. 3-2). Nevertheless, "Shabbat services typically held on Friday evenings are held on campus at the UCSD international Center" (p. 4.2-9), and HCJL intends that "large religious gatherings would be held at rented University facilities" (p. 3-3). Therefore I conclude that there is no issue of church-state separation that requires a permanent facility to be located off-campus in a residential area.

AN-3

According to the DEIR, 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. Yet, as the map (Fig. 2-3 on p. 2-4) makes clear, the site is also bounded on the west by Torrey Pines Road. This is a major thoroughfare that will house the new Craig Venter institute, which is omitted from that map and from any consideration in the DEIR, even though the Venter Institute will contribute to substantial additional traffic congestion at the intersection of Torrey Pines Road, North Torrey Pines Road, and La Jolla Village Drive.

According to Section S5, a range of reasonable alternatives and locations must be discussed in the EIR. Yet most of the alternatives, including the Reduced Project Alternative and the Environmentally Superior Alternative, also called the Existing with Improvements option, focus on Site 553. I agree that the No Project Alternative is unsatisfactory, because it does not provide for a student center. I do not agree that Hillel has exhausted all alternative locations. The Site 575 location may not be as attractive a terrain as Site 653, but it does avoid locating the student center in a residential area, it is not my responsibility to find other locations. The sites that Hillel views as unavailable may simply cost more than Hillel wants to spend. Some of those sites have become unavailable but might have been available had Hillel not continued to insist on Site 653. The preference for a permanent fiscility is understandable, but the feasibility of a long-term tease dught to be considered more thoroughly. Certainly that signaling that are 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" (p. 9-3) is artificial, in that 1/4 mile is an arbitrary distance and the designation of the southern portion of UCSD, rather than of the center of UCSD is an obvious bias toward Site 653.

According to the conclusion of Section 9.5.2, overall impacts of the Site 675 Alternative on Transportation/Circulation/Parking might be considered the same as those of Phase 1/Phase 2. Why then does Table 9-1 show those overall impacts as greater than Phase1/Phase2? This seems to be an intentional deception involving one of the most significant issues regarding the site.

The justification for the Existing with Improvements option is vague. Hillel currently uses the house at 8976 Cliffridge Avenue "for administrative offices, one-on-one counseling, and meetings with students" (p. S-1, repeated on p. S-3 and 1-1). Under the Existing with Improvements option his house would be converted to permanent status. It is claimed that this option is analyzed at an equal level of detail as the Phase 1/Phase 2 project, but three different uses are presented (1) office and administrative use, (2) religious programs, and (3) administrative, religious counseling, and meeting space. It is asserted that the permanent use of the Cliffridge property by Hillel would be consistent which the land use designation, goals, and policies for the applicable community plan, LLSPD ordinance, and development regulations, but these uses are in violation of the zoning for single-family residences, which, according to the LLSPD ordinance, permits "churches, temples, or buildings of a permanent nature, used primarily for religious purposes". It is claimed that there would be no increase in the number of staff or activities at this location, and thus that no increase in the number of staff or activities at this location, and thus that no increase in the number of staff or activities at this location, and thus that no increase in the number of staff or activities at this location, and thus that no increase in the number of staff or activities at this location, and thus that no increase in the number of staff or activities at this location, and thus that no increase in the number of staff or activities at this location, and thus that no increase.

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 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.

AN-4

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

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.

- AN-5 This error was revised in the Recirculated EIR (December 2013).
- AN-6 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.
- AN-7 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"

AN-7 (cont.)
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.

in parking would be required. In contradiction, the only detailed modification associated with this option is to provide six parking spaces. There is no analysis of why this would be adequate.

AN-8

I do not believe in the validity of Hillel's survey of 115 students at UCSD, which found that approximately 80 percent of them stated that they would walk to the Hillel facility at its proposed location (p. 2.4.2-9). Of course, students supporting the CPU below on insection for providing an excellular office of the pumper of the depute will walk at discharge of

them stated that they would walk to the Hillel facility at its proposed location (p. 4.2-9). Of course, students supporting the HCJL have an incentive for providing an overly optimistic estimate of the number of students who will walk a distance of up to 2 miles (from the most distant dormitories). Moreover, the survey includes a faulty estimate that "of the 20 percent that suggested they would drive to the facility, approximately 5 percent ... responded that they would carpool". The estimate is faulty because that 5 percent represents exactly one student, a number too small for a statistical analysis. This 5% figure is then exaggerated to conclude that "if 50 students were to attend a typical event, 20 percent would drive (10 vehicular trips). Of the 20 percent of students who would drive, or 10 potential vehicular trips, half would carpool (five total vehicular trips). Therefore, five parking spaces would be needed to serve the students." (p. 4.2-33) The correct number, based on the statistics provided, is that of those 10 vehicular trips only 5%, or 0 or 1 they would carpool, so that 9 or 10 would be single-occupant trips, and 9 or 10 parking spaces would be needed to serve those students, not 5.

AN-10 Reliance on current transit conditions may not be justified, because the shuttle service that UCSD Parking and Transportation Department provides is currently subject to severe financial problems and is likely to be curtailed, while the subsidy for student use of the San Diego Metropolitan Transit District SuperLoop buses cannot be maintained

AN-11

The proposal requests a right-of-way vacation for a portion of La Jolla Scenic Drive North, along with the cul-de-sac on that street. The stated goal is "to enhance the pedestrian environment through construction of sidewalks and landscaping features" (p. 3-6, repeated on 4.1-8). In my opinion construction of sidewalks and landscaping features "(p. 3-6, repeated on 4.1-8). In my opinion construction of sidewalks and landscaping features could be achieved by utilizing the land that Hillel owns. That utilization might entail additional expense or reduction of plans, but it would not require a transfer of public property to Hillel. I object to the proposed right-of-way vacation because it would narrow La Jolla Scenic Drive North and thereby delay my travel and that of my neighbors to and from La Jolla Scenic Way and La Jolla Village Drive. Besides, the narrower roadway increases the likelihood of collisions involving cars making sharp turns and drifting into the lane of oncoming traffic.

CHARLES L. PERRIN

AN-9

AN-8

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.

AN-9 See response to comment AN-8.

2

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.

Letter AO

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

DSDEAS/asandiego.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. Please see my comments addressing the accuracy and completeness of the above referenced document:

Notification/Communication

- AO-1 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 fee 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?

AO-2 Significant OMISSIONS and INACCURACIES are as follows:

AO-2

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 at: http://clerkdoc.sannet.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.

O-2 The Recirculated EIR (December 2013) included additional details the Site 675 Alternative, including the location which is shown on EIR Figure 9-1.

Project Description - A clear, complete, consistent Project Description for each Project Alemative 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 13,4000-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.

- 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:
 - 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;
 - 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 culdesac in the right-of-way which is being used for both vehicular traffic and
 parking.
 - The public will benefit from the action through improved use of the land made available by the vacation;
 - 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
 - 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.
 - The public facility for which the right-of-way was originally acquired will not be detrimentally affected by the vacation.
 - Vehicular traffic will be affected and the cul-de-sac providing both a place for turning around and parking will be lost.

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.

2

- AO-4 J. CraigVenter Instititue 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 Rerserve of the UCSD Park.
 - a. There are projected to be 4 buildings on this site.
 - Construction is <u>currently underway</u> 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 medium will be constructed on Torrey Pines Road from La Jolla Village Drive to prevent left turn in/out movements.
 - d. Vehicles leaving the Institute and going to the freeway will need to:
 - ii. Continue down Torrey Pines Rd to La Jolla Pkwy (unless they want I-5 N)
 - iii. 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.jevi.org/ems/sustainable-lab/planning-documents/
- AO-5 Local Planning Groups The dEIR fails to mention that this project (in its many iterations) has historically been denied by the local planning groups. 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,
 - Findings cannot be made: for the continued existing office use of the singlefamily 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.

AO-4 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.

AO-5 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.

AO-6

Site Development Permit for Phase1/Phase2: 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
- 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

AO-7

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 SIGNICANT contrast to the homes directly across the street. These lots are approximately 10,000 square feet in size with homes of approximately 2,000-2,3000 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".

AO-8

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/use single family homes as offices be a SIGNIFICANT impact for both Land Use and Neighborhood Character?

AO-6 See response to comment AO-3.

AO-7

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 courtvard, 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.

AO-8

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."

AO-8 (cont.) 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

Land Use Precendent: 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".

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."

AO-9b

- 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://tonga.ucsd.edu/studentorgregistration/RdOnlyList.aspx?frmFocus=18

AO-9c

- 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!

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.

5

As stated in the project description of the recirculated EIR AO-10a AO-10a Proposed Use (page 3-16/19): Hillel is proposing the following use: (December 2013), Shabbat meals and holiday celebrations would be held in rented facilities on campus, not on the Phase 1/Phase 2 · Regular hours of operation: Monday through Friday 9am to 10pm project site. · 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 The Site Development permit would be subject to conditions of 200 expected daily "trips" to HCJL. approval which would include attendance capacity limits. Specifically, Section 3.4.2.1(a) of the Final EIR has been revised to "Shabbat services, concerts, high-holiday services, distinguished speaker events, and other large detail proposed attendance levels. As detailed therein, it is expected, gatherings would continue to be held on campus in rented facilities." with limited exception, that programs to be held at the site will have Hillel provides 'expected' hours, activities, and trips. These "expectations" are not binding on between 10 and 50 attendees; however, a conservative approach to the future use of the facility. There is no Conditional Use Permit that would govern hours of the operations of the facility is based on a total of up to 100 visitors operation, attendance, number of activities. What is to prevent "large gatherings" from being to the facility during peak hours. On these limited occasions, held at the HCJL in the future? attendance at the HCJL could be greater than 100 persons and What is the MAXIMUM ALLOWABLE OCCUPANCY? would trigger implementation of a Parking Management Plan. What is the maximum allowable occupancy including the external courtyard? Overall, it is anticipated that up to eight times a year, occupancy What is to prevent "large gatherings" from being held at the HCJL in the future? AO-10b could be between 100 to 150 people, and up to four times per year The industrial kitchen is built to accommodate such activity. Is there a Conditional Use Permit that would restrict hours of operation, attendance and number AO-10c occupancy could be greater than 150. At no time would occupancy of activities? Is not, would the applicant accept a CUP? of the facility be allowed to exceed its maximum under the applicable AO-10d Is this "Proposed Use" consistent with the activity of a single-family home? code. AO-10b 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. AO-10c 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. The proposed use is not consistent with the activity of a single-family AO-10d home, but it nonetheless is allowed within the zone. See response to comment AO-10a.

AO-11

Transportation/Circulation:

AO-11 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.

- AO-12

 Traffic Hazard #1: Making access to the vacant site associated with Phase 2 would be a rightin/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.
- AO-13

 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 used by: residents, people cutting through the neighborhood bypass the signal at Torrey Pines Road (which will be exasperated by the Venter 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.
- AO-14 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.
- AO-15 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

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.

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.

7

A project driveway is proposed on La Jolla Scenic Way AO-12 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.

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-13 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

AO-13 (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.

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.

AO-14 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.

AO-15	See response to comment AO-13.
	'

AO-16

AO-16 Parking (page 3-20) "There are no specific parking regulations for the proposed use of Phase 2 of the HCJL in the City's Municipal Code; therefore a use-specific parking study and analysis was completed for the HCJL.....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 inches 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 than the appropriate standard is 30 spaces / 1,000 square feet or 195 spaces.
- If Hillel, 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
 - 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?
- 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 ?? spaces on Torrey Pines Road due to the Venter Institute.

AO-20

The dEIR incorrectly determines Parking Demand (page 4.2-33 and Appendix B) based
on site-specific surveys from UCLA Hillel (where parking is provided via a pay student
lot across the street), UCSB Hillel, and UCSD Hillel (is it appropriate to use a survey
from the site being evaluated?) and based on average parking rate for California Hillel
(again, averages are miscalculated as UCLA Hillel parking is not available on-site, but is
via a student parking lot across the street).

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

AO-16 (cont.)

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.

- AO-17 Please see the response to comment AO-16.
- AO-18 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.
- AO-19 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.

AO-19 (cc	ont.)
,	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.

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 Ltrs	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 (duplica

The total pages (without duplicate) is = 953 pages

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/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:

AO-21b

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)

AO-21g

f) What is the maximum allowable occupancy for each alternative?

AO-21a 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.

- AO-21b The Recirculated EIR (December 2013) included a map of the Site 675 Alternative (see Figure 9-1).
- AO-21c 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.
- AO-21d 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).
- AO-21e If the commenter is referring to the Existing with Improvements Alternative, this alternative would not require a ROW vacation. See response to comment AO-21c.
- AO-21f 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.

AO-21g Interior occupancy for each alternative would be as follows: Existing with Improvement Alternative would be approximately 10. Reduced Project would be approximately 160.

9

AO-22a	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 Chiffridge Avenue. The project site is bounded to the north by La Jolla Village Drive, to	AO-22a	The applicant owns the 0.8-acre vacant parcel. The Cliffridge property is 0.2 acres.
AO-22b	 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? 	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	If the Public Right-of-Way Vacation is denied, would the Phase 1/Phase 2 Project be a viable option?	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
AO-22d	What is maximum allowable occupancy of the proposed building (as opposed to the projected occupancy)?		proposed project as currently designed could not be approved.
		AO-22d	See response to comment AO-10a.
AO-23a	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?	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
AO-230 AO-23c	 Is the project site for this option only the single-family home at \$976 Cliffridge Avenue? Is a Site Development Permit required? 		boundaries.
AO-23d AO-23e AO-23f	 Is using a single-family residence for "administrative office, one-one-one counseling and meetings with students" a currently allowed use under the La Joffa Shores Planned District Ordinance? Does this option include any Public Right-of-Way Vacation (e.g., for the cul-de-sac)? What is maximum occupancy allowable? 		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-24a	No Project Alternative DEIR Summary page 4: Under the No Project Alternative, "existing conditions on the Cliffridge property and vacant site would be retained".	AO-23b	The Existing with Improvements Alternative contains the property at 8976 Cliffridge Avenue, including the existing single-family
	 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)? 		residence.
AO-24b	 How long has the applicant has been allowed to use a singe-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? 	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
AO-24c	 Is there currently an Open Code Violation for the use of the single-family home at 8976 Cliffridge? 		deviation from the Maximum Paving and Hardscape in Residential Zones Requirement would be required.
	10	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.

AO-23f	The maximum occupancy in the Cliffridge house is 13 occupants.
AO-24a	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.
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.

AO-24d	 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 	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.
	notified of the proposed actions?		
AO-25	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".	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.
	➤ Is the single family home at 8976 Cliffridge Ave. owned by the applicant? If not, then		responde to comment to 2 to through the 2 to
	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"?	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
AO-26a	Reduced Project Alternative		9.2.3.
710 200	DETR Summary, page 5: under the Reduced Project Alternative, "two structures – The Library/Chapel along with the second floor of the HCJL Student Ceneter – would be reduced or eliminated" and the use of the single-family home at 8976 Cliffridge Ave, would be "converted"		The physical boundaries of the alternative project site are the same
	to permanent office use". The document also states the Phase 1/Phase 2 project has been "determined to be the minimum space needed".		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
	➤ What are the boundaries of the project site for the Reduced Project Alternative?		associated with this alternative would be 4,307 square feet (on the
AO-26b	 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 		vacant lot).
AO-26c	Ave?		vaoant iotj.
AU-260	Does the Reduced Project Alternative require a Public Right-of-Way Vacation (e.g., in order to vacate the cul-de-sac)?	AO-26b	This alternative would continue to use the existing structure located
AO-26d	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?		at 8976 Cliffridge Avenue.
	 What additions / modifications could be made at a later date? What additions / modifications could be made without additional permits? Would the Site Development Permit specifically state that no further additions or 	AO-26c	Like the proposed project, this alternative would include a ROW vacation.
AO-26e	modifications would be allowed? What is maximum allowable occupancy?	AO-26d	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
	11		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.
		AO-26e	Pursuant to City Building Code, maximum capacity would be 170 persons.

AO-27a	Site 675 Alternative DEIR Summary, page S-8: Site 675 is a vacant and City-owned site in La Jolla. 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.	AO-27a	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.
AO-27b	 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 alterative and the near surroundings? Are there any single-family homes within 30 feet of this site? 	AO-27b	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
AO-27c	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"?		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.
AO-28a	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". 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	AO-27c	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.
	not?	AO-28a	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
	12		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.

AO-28a (cont.)

Therefore, the EIR describes a reasonable range of alternatives, as required under CEQA. Alternate locations were considered regardless of the side of campus the alternative is on.

AO-28b 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

	Introduction	AO-28b	site locations. As no alternative sites would feasibly meet the objectives of the project, and would not result in the avoidance or
AO-29	Page 1-1, "University of California San Diego (UCSD) Hillel Center for Jewish Life Project (HCJL)"		lessening of any significant impacts of the proposed project, the alternative locations were rejected.
	 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? 	AO-29	The proposed project is currently called "the Hillel Center for Jewish Life Project (HCJL)." The project was previously called Hillel Student
AO-30a	Page 1-1, "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		Center of San Diego, but changed its name due to unexpected confusion as to the facility's association with the college.
	south by La Jolla Scenic Drive."	AO-30a	See response to comment AO-21d.
AO-30b	 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? 	AO-30b	The size of the ROW vacation would total 0.49 acre (21,278 square feet). The Reduced Project Alternative would have a similar ROW
AO-30c AO-30d	 What is the lot size of each parcel? What is the total lot size of the each of the Proposed Project Alternatives? 		vacation. No other alternatives would include a ROW vacation.
AO-31a	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."	AO-30c	The lot size of each parcel is as follows: 0.2 acre for the Cliffridge property; and 0.8 acre for the vacant site.
	 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? 	AO-30d	The Site 675 Alternative is 13,400 square feet. The remainder of the alternatives utilize the same parcel(s) as the proposed project.
AO-31b AO-31c	 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? 	AO-31a	The Cliffridge property is a single-family residence that is currently being used by Hillel to provide for religious programs.
AO-31d	 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? 		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.
AO-32	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."	AO-31b	No person currently resides in the residence.
	 Would the single-family residence be sold or rented? Would the ownership of the property change? 	AO-31c	See response to comments AO-24b and AO-24c.
		AO-31d	The Cliffridge Residence currently serves as the Hillel facility as detailed in Chapter 3 of the EIR.
	13	AO-32	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.

	1.0 ENVIRONMENTAL SETTING Page 2-5, 2.3.1 Landcover	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.
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".		The sidewalk is not included in the ROW vacation.
	 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	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
AO-34	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".		of the EIR, no sensitive wildlife species were detected on-site during the survey; however, the project site was noted to contain trees that
	 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. 		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 he removal of habitat that supports active nests to outside the breeding season for
AO-35	Page 2-5, 2.3.2 Topography, "Theproject siteis bounded by steep, cut slopes on the north and east."		these species (February 1 to September 15) unless additional steps are taken to assure no nesting raptors are present on site.
	 What are the exact cut slopes to the north and east? What is the proposed grading for those slopes? 	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
AO-36a	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		at La Jolla Village Drive varies from 0 feet to 12 feet.
AO-36b	 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? 		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).
	 Why was the zoning designation changed? Has the 0.8-acre vacant lot ever been considered a transition zone between the UCSD 	AO-36a	The parcel is zoned as single-family residential.
AO-36c	 campus and the adjacent residential community? How would developing the vacant lot been consistent with "preserving remaining open space and natural habitat"? 	AO-36b	See response to comment I-6b.
AO-36d	 Are there existing "available urban amenities" within 1 mile of the proposed site? 	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).
	14		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).

2.0 PROJECT DESCRIPTION

AO-37a Page 3-1 "Hillel currently uses the Cliffridge 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 Cliffridge Ave. for this purpose?
- · Is this an allowed use under the Section 1510.0303 of the PDO?
- AO-37b
- Is there an open code violation related to this use?
- . Why is the City of San Diego not enforcing this code violation?
- AO-38 Page 3-1, "The permanent use of the Cliffridge 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.
- AO-39 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 HCJL 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?

- 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.

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- AO-40 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 HCJL by providing a facility via a long-term lease?
 - · Are there any Hillel facilities that are rented or leased?
- AO-41 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 ¼ mile? If a student has a class on the north-east side of campus, wouldn't it be more than ¼ mile to reach the proposed project site?
 - UCSD offers and extensive 'free' shuttle system for students that travels throughout the campus, the UTC area, to UCSD Medical Center in Hillcrest, Thorton 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?

AO-40 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.

AO-41 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. 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 southern portion of campus is

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.

3.3 DISCRETIONARY ACTIONS		
Page 3-5: 3.3.1.1 Site Development Permit	AO-42a	The project would be consistent with the character of the
"A SDP is required for development within the LJSPD"		neighborhood. See response to comment AO-7.
 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 is a single-family residential zone consistent with protecting the residential character of the neighborhood? 	AO-42b	See response to comment AO-8.
	7.0 .20	
 Did the local planning groups (e.g., La Jolla Community Planning Association) recommend approving a SDP for this project? If not, why not? 	AO-42c	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.
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"	AO-43a	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.
 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? 	10.40	
 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? 	AO-43b	The size of the ROW vacation would total 0.49 acre (21,278 square feet), as follows:
 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? 		- cul-de-sac: 6,209 square feet - street: 15,069 square feet
What is the square feet of the Project 1 / Project 2 alternative with the ROW vacation? Would be POW and in the Project 1 / Project 2 alternative with the ROW vacation?		- parcel: 0.49 acres (21,278 square feet)
If the ROW vacation is NOT approved, is the Phase 1 / Phase 2 alternative still a		parson or to dorse (21,210 equals reet)
viable option? If not, why not?	AO-43c	See response to comment AO-21d.
Page 3-6, "There is currently no sidewalk along the northern side of La Jolla Scenic Drive North."	AO-43d	This is a correct statement.
 There is a very well established footpath along the northern edge of La Jolla Scenic Drive North. Would the Phase 1 / Phase 2 Alemative provide for a sidewalk where the existing and often used footpath currently is? 	AO-43e	See response to comment AO-22c.
17	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.
	 Page 3-5: 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 is 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 specifies 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 cornect? 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 square feet of the ROW vacation of the open space along the street? What is the square feet of the ROW vacation of the open space along the street? What is the square feet of the Project 1 / Project 2 alternative without the ROW vacation? What is the square feet of	Page 3-5: 3.3.1.1 Site Development Permit *A SDP is required for development within the LJSPD" * 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 is 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.** ** Frem Figure 3-1, it appears that the ROW vacation from this description.** ** Frem 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 of the open space along the street? ** What is the square feet of the ROW vacation of the open space along the street? ** What is the square feet of the ROW vacation for the cul de sac? ** What is the square feet of the Project 1 / Project 2 alternative with the ROW vacation? ** What is the square feet of the ROW vacation for the open space along th

		AO-45a	Figure 9-1 details the Existing with Improvements Alternative site
AO-45a	Page 3-6, 3.3.2 Existing with Improvements Option "Per the Parking Impact Overlay Zonelots 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."	7.0 400	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	 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 home with a completely paved backyard? Isn't a Site Development Permit also required for development within the LJSPD? 	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 AO-45d	 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? 	AO-45c	See response to comment AO-8.
AO-45e	 Isn't using a single-family residence as an office a SIGNIFICANT impact to "Land Use" and "Neighborhood Character"? 	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.
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AO-46	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,"	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 AO-48 AO-49 AO-50 AO-51	 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 "7 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 walf" — 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/turn 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 dEJR. 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 3-15 	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.
	19	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.

AO-49	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.
AO-50	The recirculated EIR (December 2013) did not identify any new or different impacts to the environment compared to the previously circulated EIR.
AO-51	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."

3.4.2 PROPOSED USES

AO-52 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 cleanup) 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

AO-53
a. 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 532 (133 * 4) 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)?

AO-54 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?

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.

AO-57

AO-55 b. HCJL Student Center, page 3-19 "The student center would be a to

AO-56

AO-57

"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 HCJL would include...a kitchen...men's and women's restrooms with showers, two exterior balcony areas."

- I don't understand. Is the HCJL 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 courtward?
- AO-58 Will smoking be allowed on the exterior balcony areas? In the outside courtyard?

AO-55 The project would consist of the construction of three individual structures around a central outdoor courtyard providing 6,479 square feet of GFA.

AO-56 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.

		1	
AO-59	 e. Parking, page 3-20 "There are no specific parking regulations for the proposed use of Phase 2 of the HCJL in the City's Municipal Code; therefore a use-specific parking study and analysis was completed for the HCJLA 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 inches 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 than the appropriate standard is 30 spaces / 1,000 square feet or 195 spaces. • If Hillel, 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 	AO-59	See response to comment AO-16.
AO-60	 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	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)?	AO-61	See response to comment AO-19.
AO-63	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 site 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 as 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?	AO-63	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. 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.

	3.4.3 Access and Circulation for Phase 1 / Phase 2		
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 WayFor 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?	AO-64	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-65	 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? 	AO-65	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.
AO-66	 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 		With respect to loss of parking, see response to comment AO-19.
	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 threatre-goers looking for parking La Jolla Shores residents who cut-through the neighborhood to avoid the signal at Torrey Pines Road	AO-66	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-67	• 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!	AO-67	See the response to comment AO-12. 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.
	 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? 		Serving residences located on La sonia esernic Envertorini.
AO-68	Page 3-45, "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." • Where and how would it be relocated? • Is there a Figure to show the new configuration?	AO-68	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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Page 3-45, "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 as there would no longer be a need for a stop sign."	AO-69a	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
 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? 	AO-69b	be confusing to drivers. 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
 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? 		wished the stop sign to remain, the City of San Diego would consider that request.
they are going to 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	AO-69c	See response to comment AO-69a.
"curve" (because they will want to do this)?	AO-69d	Drivers that mistakenly enter La Jolla Scenic Way will be allowed to turn around at the curve.
 Page 3-45, "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 SIGNFICANT 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 a residents of La Jolla Shores to shortcut 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? 	AO-70	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.
Is the following calculation reasonable? 3.4 fort. Proposed etwact width.	AO-71	Please see response to comment AO-70.
(3) feet 18 inch Parking allowance from edge of curb (both sides of street) (15) feet Parked cars – 7.5 feet average width of a car x 2 cars (15) feet Cars driving in both directions (7.5 feet x 2) 1 foot or 12 inches to passnot 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?		The corners and radius would also conform to City standards.
	removed, and a new left/curve sign installed on La Jolla Scenic Drive North. By providing a curve, local vehicular circulation would be enhanced as 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 to 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 Willage Dr. Would people be allowed / able to turn around at the "curve" (because they will want to do this)? Page 3-45, "At 3-4 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 SIGNFICANT 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 a residents of La Jolla Shores to short-cut the traffic signal and Torrey Pines Road. It has two sharp turns — one at La Jolla Scenic Way and th	 Page 3-45, "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? 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 to 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 3-45, "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 SIGNPICANT TRAFFIC HAZARD. This is not at pytical 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 a residents of La Jolla Shores to shortest the traffic signal at Torrey Pines Road. It has two sharp turns — one at La Jolla Scenic Drive North at the current width? Is the following

AO-72 AO-73	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 is of the property frontage is currently dedicated to public right-of-way? a. Siting and Transportation, Page 3-47	AO-72	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.
	"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?	AO-73	A bus stop is located on the south side of La Jolla Village Drive adjacent to the project site (that is proposed to remain).
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3.6 HISTORY OF PROJECT CHANGES AO-74 Page 3-49, "In 1999, at the request of Hillel, the City issued a request for proposals for potential AO-74 The 0.8-acre vacant lot (344-120-4300) includes Site 653 and the sale of the 0.8-acre vacant site historically referred to as Site 653. In 2000, Hillel responded to vacated ROW. With respect to the designation of Open Space, see the request and was awarded exclusive negotiating rights to purchase the site after a public hearing." response to comment AO-36b. . 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 Cliffridge Avenue - when the AO-75 This comment does not raise any substantive issues related to the Cliffridge property was acquired by a private nonprofit foundation that supported Hillel. The adequacy or accuracy of the EIR. No further response is required. 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-onone 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 AO-76 page 3-50, "By designing three smaller, individual structures (two one-story buildings and one AO-76 Please see EIR Section 4.12.3.1(a) for the analysis of the project's two-story building). Phase 1/Phase 2 would more closely relate in scale to the adjacent singlefamily residences along La Jolla Scenic Drive North and Cliffridge Avenue." bulk and scale compatibility with the surrounding land uses. As stated therein, the project would be compatible with the · These three individual structures are clustered together around a central courtyard neighborhood character. See response to comment AO-7. 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. 26

4.0 ENVIRONMENTAL ANALYSIS

AO-77 LAND USE

AO-78

Page 4.1-1, "The project site contains the Cliffridge property that currently serves as the Hillel office."

- INACCURACY: The existing use should be described as a single-family residence at 8976 Cliffridge Ave. A property which is not currently owned by the applicant.
- The use of the single-family home at 8976 Cliffridge 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?
- AO-79 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?
- AO-80 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 & culde-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?

AO-77 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.

- AO-78 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.
- AO-79 Please see the response to comment AO-36b.
- AO-80 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.

AO-81	Page 4.1-6, "According to the LJSPD 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).	AO-81	Please see responses to comments AO-8 and AO-9a.
	 Per the Mission Statement (http://ucsdhillel.org/about) "Hillel of San Diegoserves 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 eampus. 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 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"? 		
AO-82	Page 4.1-8 "Would the project require a deviation or variance, which would in turn result in a physical impact on the environment?"	AO-82	With respect to project findings associated with the ROW vacation, see response to comment AO-3.
	 d. OMISSION: The dEIR only addresses the deviation from Driveway Curb 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 I, 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. e. INACCURACY: Based on the above determination by the La Jolla Community Planning Association, the impact should be considered SIGNIFICANT. 		
AO-83	Page 4.1-9 "The Campus Parking overlay requirements would limit the surface parking to four vehicleswould 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 its inconsistency with the land development code.	AO-83	See response to comment AO-45a.
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	4.2 TRANSPORTATION/CIRCULATION/PARKING	AO-84a	Traffic counts were done on one day in February (February 25). One day of traffic counts is the standard of practice for collecting traffic
AO-84a AO-84b AO-84c	 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 (Montesorri, Children's School, La Jolla Country Day) have a one week winter holiday in February. Was this taken into consideration? 	AO-84b	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.
AO-85	Page 4.2-3, "LOS A through D are considered acceptable for urbanized areas where further improvement in LOS in not feasible or practical".	AO-84c	The La Jolla Country Day and Montessori Schools were in session when the traffic counts were conducted.
AO-86	 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 that 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." 	AO-85	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.
40.07	 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"		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
AO-87	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-travelled footpath that is used by pedestrians.		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.
		AO-86	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."
	29		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."
		AO-87	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 dist featureth.

dirt footpath.

		AO-88	Please see the response to comment AO-11.
AO-88	Page 4.2-9, "There are no local or national established trip generation rates for a facility such as this projectsite-specific data from the existing Hillel center (both the Cliffridge property and the existing on-campus space) indicate many current patrons walk from UCSDsurveys were conducted by the applicant to determine the number of patrons who would walk to the site instead of driveThe UCSD survey collected responses from 115 students. The results of this	AO-89a	La Jolla Scenic Way is 261 feet away from La Jolla Village Drive south to La Jolla Scenic Drive North.
	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."	AO-89b	The proposed driveway is located about 150 feet from the La Jolla Village Drive / La Jolla Scenic Way intersection.
	 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 walkthere 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? 	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-89a	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 Deseo to reach their destination.: • La Jolla Scenic Way is how many feet from La Jolla Village Dr to La Jolla Scenic Drive	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
AO-89b	 North? The right-in/right-out driveway is proposed to be how many feet from the intersection at La Jolla Village Dr.? 		into the intersection" is speculation. See also response to comment AO-89c.
AO-89c	 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 	AO-89e	See response to comment AO-19.
AO-89d	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	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.
40.00	the intersection?	10.000	•
AO-89e AO-89f	 How many existing 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 	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-90a	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?	AO-90b	With respect to the adequacy of sight distance, see responses to
AO-90b	Given that the trash area is located on the southeast corner, will cars exiting the facility		comments AO-12 and AO-13.
AO-90c	 have good sight vision to see cars coming from La Jolla Scenic Dr North? Is it possible that cars exiting the facility will chose 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 Cliffridge Ave and out to Torrey Pines Rd? This will create additional circulation through an already congested neighborhood. 	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.
	30		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.

AO-91	Page 4.2-16/20 "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?	AO-91	Please see response to comment AO-4. The Final MND (2007) for the Venter Institute stated that 16 on-street parking spaces along Torrey Pines Road would be removed. The project completed construction in 2014.
AO-92	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? • UCSB 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.	AO-92 AO-93	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. This data is within Appendix P to the Traffic Impact Analysis
AO-93	Page 4.2-34, "information was collected from Hillel student centers across the countyThe 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?		(Appendix B to the EIR).
AO-94	Page 4.2-34 Parking Supply: "There are currently seven parking spaces on La Jolla Scenic Drive NorthAccess 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 parkedall 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?	AO-94	With respect to the number of parking spaces that would be lost, see response to comment AO-19. With respect to the number of parking spaces lost from the Venter Institute, see response to comment AO-91.

AO-95

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 Venter).

AO-96 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 dEIR 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 entrance is TWO 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 uturn on La Jolla Scenic Way to La Jolla Scenic Drive North"
 - This is a very real possibility.
 - Omission: dEIR fails to address the possibility that drivers may u-turn in the residential driveways along La Jolla Scenic Drive North
 - Omission: dEIR 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?

AO-97

OMISSION: Is the elimination of 6-7 on-street parking spaces (along La Jolla Scenic Way) allowed in a parking impact overlay zone?

32

AO-95 See response to comment AO-16

AO-96

With respect to the project driveway and issues relating to safety and sight distance, see response to comment AO-12. 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.

With respect to U-turns on the roadways, 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 Wav 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

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.

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 a not a valid comparison.
 - Hillel UCSB 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.

AO-98 See responses to comment AO-16.

AO-99 See response to comment AO-16.

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AO-100a 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

AO-100b

AO-100d

· Car alarms being set (beeping) and car alarms going off

 Increased noise due to cars coming and going AO-100c

 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.

AO-101a 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 feets in width that are setback 12 feet to 15 feet from the front property line.

AO-101b

· 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

AO-101c

. Is there a retaining wall along La Jolla Scenic Dr North? If so, how long and how

AO-101d

 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?"

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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AO-100d The project would have no effect on what may or may not be occurring due to the La Jolla Playhouse.
AO-101a 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.
AO-101b 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.
AO=101c 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 bern and screening walls). The walls would be at least four feet high ir order to screen parking areas, but would not exceed a height of six feet. The total length of screening walls is 267 feet.
AO-101d Views from private residences are not required to be analyzed unde 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.

As shown in this table, many of the nearby existing bomes are three-bedroom, two-bath howsels have three-car garages on large bits typical of the time. The larger found-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 \$4,540 square feet of lot. The two-story condominium 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 \$,500 square feet lot. Hillel is proposing three buildings "clustered" together around an open space. * As the three proposed building spread evenly across the site (like the homes are located each in the middle of their lot?) * Does clustering the buildings regard evenly across the site (like the homes are located each in the middle of their lot?) * Does clustering the building spread evenly across the site (like the homes are located each in the middle of their lot?) * What is the lot size of the parking area? * What is the lot size of the parking area? * What is the lot size of the parking area? * What is the lot size of the parking area? * Additionally, the overall use of the buildings are clustered together? * Additionally, the overall use of the buildings is not at all consistent with the use of a single-family home. * AD-102b * Additionally, the overall use of the buildings is not at all consistent with the use of a single-family home. * AD-102c * The lot size is detailed above in response to comment AO-102b. The size of the parking area is approximately 8,700 square feet. * AD-102c * The lot size is detailed above in response to comment AO-102b. three buildings comprise 7,084 square feet. * AD-102c * See response to comment AO-102a. * AD-102d * See response to comment AO-102a. * AD				
Hillel is proposing three buildings redastered 'sogether around an open space. Are the three proposed building spread evenly across the six (filts the homes are located each in the middle of their let?) Does clustering the building stread evenly together give the impression of one large building? What is the lot size of the parking area? What is the lot size of the string are clustered together? What is the lot size of the parking area? What is the lot size of the proposing a student center that is time buildings, clustered together on the large building that is three times the size of the single-family homes across the street? AO-102e AO-102e AO-102e AO-102e AO-103e 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 climinate or substantially reduce those impacts. Sincerely. K. Rebeiz La Jolla Scenic Drive North Is Jolla Scenic Drive North Is Jolla Scenic Drive North Is Jolla Scenic Drive North Is Jolla Scenic Drive Nort	AO-102a	"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 condominium and townhome units have shared walls and occur in larger structures composed of two to four units."	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.
AO-102d AO-102e * Hillel is proposing a student center that is three buildings, clastered together to appear as one large building that is three time the sets of the single-family home. AO-102e * Additionally, the overall use of the buildings is not at all consistent with the use of a single-family home. AO-103 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. K. Rebsiz La Jolla Secnic Drive North La Jolla		 Hillel 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? 		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-103 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. K. Rebeiz La Jolla Scenic Drive North La Jolla, CA 92037 The lot size is detailed above in response to comment AO-102b. three buildings comprise 7,084 square feet. AO-102d See response to comment AO-8. 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), Transportat Circulation, Parking (Section 4.2), or Visual Effects Neighborhood Character (Section 4.12), for the reasons detained above in response to comment AO-102b. The lot size is detailed above in response to comment AO-102b. three buildings comprise 7,084 square feet. AO-102d See response to comment AO-102a. AO-102e See response to comment AO-102a. AO-103 The EIR evaluated and determined that there would be no significant impacts with regards to Land Use (Section 4.1), Transportate Circulation, Parking (Section 4.12), or Visual Effects Neighborhood Character (Section 4.12), for the reasons detained above in response to comment AO-102b.	AO-102d	 Hillel 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 	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.
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. K. Rebeiz La Jolla Scenic Drive North La Jolla, CA 92037 The EIR evaluated and determined that there would be no signific impacts with regards to Land Use (Section 4.1), Transporta Circulation, Parking (Section 4.2), or Visual Effects Neighborhood Character (Section 4.12), for the reasons deta within each section, respectively.				The size of the parking area is approximately 8,700 square feet.
AO-102e See response to comment AO-8. La Jolla Scenic Drive North La Jolla, CA 92037 AO-103 The EIR evaluated and determined that there would be no signifi impacts with regards to Land Use (Section 4.1), Transporta Circulation, Parking (Section 4.2), or Visual Effects Neighborhood Character (Section 4.12), for the reasons deta within each section, respectively.	AO-103	transportation/circulation/parking, and visual effects and neighborhood character. Therefore the	AO-102c	
La Jolla Scenic Drive North La Jolla, CA 92037 AO-103 The EIR evaluated and determined that there would be no significant impacts with regards to Land Use (Section 4.1), Transportar Circulation, Parking (Section 4.2), or Visual Effects Neighborhood Character (Section 4.12), for the reasons detay within each section, respectively.		Sincerely,	AO-102d	See response to comment AO-102a.
Ita Jolla, CA 92037 AO-103 The EIK evaluated and determined that there would be no significant impacts with regards to Land Use (Section 4.1), Transportary Circulation, Parking (Section 4.2), or Visual Effects Neighborhood Character (Section 4.12), for the reasons detay within each section, respectively.		K. Rebeiz	AO-102e	See response to comment AO-8.
35			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.
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Letter AP

 From:
 judy shufro <JSHUFRO@san.rr.com>

 Sent:
 Tuesday, March 12, 2013 11.59 AM

 To:
 DSD EAS

 Subject:
 Hillel Center for Jewish Life

AP-1 #212995

How many times does the Hillel project have to be denied before it is actually denied?

I live accross the street from the proposed project in a complex of 128 homes which would be adversely affected by such a project.

Inadequate parking, noise and college student drivers endanger our residential neighborhood with our increasing numbers of children.

We have responded negatively to this project for years now only to see it rear its ugly head before us time and time again. We are fearful of its impact on our residential area. The armmended project does not address the continued lack of parking and noise. It also is NOT one-half of the initial plan size.

Please, please, please do not permit such a thing to happen.

Thank you.

Judith Shufro

Resident since 1997 for my websites, click below:

http://www.judithshufro.com/

http://members.tripod.com/~jushu/index.html

AP-1 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 onsite 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.

Letter AQ

Ross M. Starr, Ph.D. 8675 Cliffridge Ave. La Jolla, CA 92037 January 30, 2013

Ms. E. Shearer-Nguyen Environmental Planner 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. 212995

Dear Ms. Shearer-Nguyen

AQ-2

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:

AQ-1

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 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 grudging (primarily symbolic) 15% of the building (library/chapel) may be for religious purposes.

AQ-3 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

AQ-1 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.

- AQ-2 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.
- AQ-3 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.

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 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 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 occupant load of approximately 290 persons (see http://www.scribd.com/doc/13284922/Section-1004-Occupant-Load). That is the peak use figure that is relevant.

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 142-05F. 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 misconstruction, 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.

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 Connection of San Diego (see http://tonga.ucsd.edu/studentorgregistration/RdOnlyList.aspx?frmFocus=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 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:

AQ-4

AQ-5

2

AQ-3 (cont.)

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.

AQ-4 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.

AQ-4 (cont.)

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 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.

AQ-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 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.

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.

Translating these remarks: the precedent is indeed set. Approval of the HCJL project (formerly known as Hillel of San Diego Student Center II) means that any UCSD student religiouslyaffiliated organization with enough money to buy several adjacent (already developed) lots will be freed by the HCJL 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.

AQ-6a

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 action 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.

AQ-6b

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 (Cliffridge 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 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.

AQ-6c

Pages 71 through 77 of (La Jolla) UCSD Hillel Center for Jewish Life / Project No. 212995 / Draft EIR / App-A-NOP Comment Letters document decades of City land use planning --- 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.

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.

The right of way provides the hardscape 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.	AQ-6d	See response to comment AQ-6b.
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 (Cliffridge 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 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.	AQ-7	Please see the response to comment AQ-6b.
Omission 3, Violation of the La Jolla Shores Planned District Ordinance: The recirculated DEIR does not recognize that the proposed development violates the LJSPDO. The Ordinance is clear; university facilities do not belong in the single family residential area.	AQ-8	See response to comment AQ-1.
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.	AQ-9	There is no such requirement and the commenter does not provide evidence of such requirement. The project site is owned by Hillel.
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 HCJL. 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 HCJL and the Venter Institute.	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.
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 Digitally signed by Ross M. Starr Digitally signed by Ross M. Starr Digitally signed by Ross M. Starr, e-US, or-University of California, San Diego. auticonomics Dept., when the Commissional		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.
4		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.
	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. Omission 2, Traffic Safety: The recirculated DEIR and the associated traffic study on of 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 (Cliffridge 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 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. Omission 3, Violation of the La Jolla Shores Planned District Ordinance: The recirculated DEIR does not recognize that the proposed development violates the LJSPDO. The Ordinance is clear; university facilities do not belong in the single family residential area. 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. 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 HCJL. The Institute reconsider cumulative effect of HCJL 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	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. 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 (Cliffridge 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 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. Omission 3, Violation of the La Jolla Shores Planned District Ordinance: The recirculated DEIR does not recognize that the proposed development violates the LISPDO. The Ordinance is clear; university facilities do not belong in the single family residential area. 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: open space on the site is required as mitigation of development on Gilman Dr. Driveway access to the project on 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: Open space on the site is required as mitigation of development on Gilman Dr. Driveway access to the project on 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: Open space on the site is required (45,000) square feet with corresponding which the project of th

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.

5

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

Letter AR

From: Tanaka, Elaine <etanaka@ucsd.edu>
Sent: Monday, February 18, 2013 12/09 PM

To: DSD EAS

Subject: UCSD Hillel Center for Jewish Life (Project #212995).

Dear Project Planners:

AR-1

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 LJ Village Dr. and Torrey Pines Rd. (near the LJ Playhouse). The car was driven by a young man that wasn't paying attention. I ended up in the hospital with pelvic and clavicle fractures. I was unable to walk for months and was unable to care for my two children. I had to cancel multiple divic/community volunteer commitments. There is already so much traffic and confusion 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/fatality. I have young children who can't even cross our neighborhood street (Cliffridge) on their own because of speeding drivers and this will just get worse if the Hillel Center is built. In fact, the house Hillel uses now on the corner has cars that back in and out all the time, and these cars nearly hit people all the time. My nelghbors 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,

Elaine Roberts Resident, Community Member, Mother 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.

Letter AS

F. Akif Tezcan, Ph.D. 8975 Cliffridge Ave. La Jolla, CA 92037

March 9, 2013

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

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

Dear Ms. Nguyen.

AS-2

Thank you for giving us the opportunity to examine the 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 proposed project (hereafter referred to as the Project) and its potential environmental impacts.

AS-1

First of all, we find that the Draft EIR was not written with clarity. The illustrations and the corresponding legends were small, vague, not easily comprehensible and rarely referred to in the text, forcing the reader to go constantly back and forth to find—often unsuccessfully—relevant information. Overall, our impression was that the DEIR was designed to confuse rather than to guide. Importantly, we find that that it contains several inaccuracies, omissions and misleading statements. Therefore, it does not convey the true environmental impacts of the proposed project. The following items are the most outstanding of several such inaccuracies, omissions and misrepresentations. Items 1 to 7 refer to the Phase 1/Phase 2 project. Issues about

the project alternatives are raised under items 8-10.

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", see for example Section S.1.1. However, the project is in fact a Student Center, which is primarily intended to serve the students of UCSD. This is clearly stated in section S.1.2, which lists, among others, the following primary objective of the 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."

This Project is not intended to build an inclusive community in the residential neighborhood in which it is proposed to be built. This stands in stark contrast to a building of religious nature (churches, synagogues etc.) located in a residential community. As such, it is not permitted under LJSPD ordinance, reflected in several decisions of the La Jolla Community Planning Association against the Project over many years.

AS-1 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.

AS-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.

RTC-533

AS-3

AS-3 2) Precedence-setting for other religious student organizations: In contrast to what the DEIR suggests, the proposed Project sets a clear precedent for 54 other UCSD student organizations to pursue off-campus facilities in the same residential area. Indeed, this is unambiguously confirmed by the following statement in section 6.3: "...there is a potential for other UCSD student religious organizations to seek offcampus facilities in the project area". It is stated in the same paragraph that "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."

Speculative statements such as these do not eliminate or mitigate the precedence-setting nature of the Project. Just as the Hillel organization was able to raise funds to purchase the Project site and develop it, any of the 54 other UCSD student organizations with religious affiliation may purchase a residential property in the same residential area and use it as a facility. They can do so without requiring further development. Whether this has a high or low probability of materializing is irrelevant – it leaves the door open for other similar student organizations. Therefore, the Project would set a firm precedence for the settlement of other religious UCSD student organizations in the neighborhood.

AS-4a

AS-4b

- 3) Attendance numbers are incommensurate with the single-family nature of the neighborhood: It is stated in Section 3.4.2.1.a. UCSD Hillel had no less than 18 activities during with more than 30 persons during the Fall 2010 academic quarter, a 12-week period. A survey would show that events of such size happen less than once, if at all, during an entire year in the immediate neighborhood. Even during a normal weekday, an event attended more 30 or more people would create human traffic and noise that is out of character for the neighborhood. It is stated in the same section that "On rare occasion, such as the opening dedication ceremony or a "welcome back" barbeque, attendance at the HCJL could be greater than listed above, but would not be expected to exceed 100 persons at any one time." First, a congregation of 100 people in a building without significant setback from a street is grossly incommensurate with the residential nature of the project site and would have a significant noise and traffic impact. Any buildings such as churches and synagogues in the same residential zone that eater to large congregations are set back and buffered from the street and nearby residences according to the LJSPD ordinance in order to protect the residential nature of the zone. This would not be the case with the proposed Project. Second, without enforcement, an "expectation" of attendance does not constitute reality. It means that there is a possibility that there may be more than 100 people in attendance. Indeed, the project size (3000 square feet of open assembly space, 984 square feet of library, and approximately 1000 square feet of offices) can legally accommodate more than 200 occupants, which would have an immense impact on the quiet residential neighborhood through noise pollution, foot and car traffic.
- AS-5
 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 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

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-4a 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 10and 50 attendees; however, a conservative approach to

AS-4a (cont.)

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.

AS-4b 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.

AS-5 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.

during the evenings and on weekends if there is an activity planned at such times. 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.)." 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. Such impacts are not discussed in the DEIR.

- AS-6

 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 misconstrued 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 LJSPD 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 places are proposed. The total building area in the Project is nearly 7000 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 for the library/chapel portion of the Project, thowever, 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 LJSPD ordinance.
- Second, the parking allocation is based on speculative projections regarding what the attendance AS-7 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 5 percent of those students responded that they would carpool." There is absolutely no detail presented about how this survey was conducted, who 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 8976 Cliffridge Ave., park their cars on Cliffridge Avenue, rather than the parking spaces of the facility or even La Jolla Scenic Drive North. This is evidence that without enforcement the same (parking on nearby streets) is likely to happen with the proposed Project.
- AS-8
 6) Significant Impact on the Visual Harmony of the Neighborhood: The Project, with a size nearing an acre and building footprint of nearly 7000 square feet, is significantly larger than any of the neighboring 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

AS-6 With respect to the project's use allowed in this location, see response to comment AS-2.

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.

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

AS-6 (cont.)

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

AS-8 (cont.)
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.

AS-9

Jolla Playhouse facilities across La Jolla Village Drive for comparison is misleading. Those buildings are nearly entirely shielded from the view of the neighborhood by significant tree coverage and by being set back from the street. Moreover, they clearly are not located in the neighborhood like the proposed Project would be; they are separated from the neighborhood by a large thoroughfare (La Jolla Village Drive) and are on university land. The Project with its large walls next to the street would not fit in the building harmony of the neighborhood; it would stand out. Comparison to the two-story townhouse complex to the east is also misleading, because the base elevation of that complex is significantly lower than that of the proposed Project.

- 7) Significant Impact on Vehicular and Pedestrian Traffic in the Neighborhood Caused by AS-9 Right-of-Way Vacation and Disregard of the J. Craig Venter Center: The DEIR fails to address the significant impact on vehicular and, in particular, pedestrian traffic that will be caused by the narrowing of La Jolla Scenic Drive North due to Right-of-Way (ROW) vacation. It does not take into consideration the heavy pedestrian/bike traffic to UCSD by the daily commuters who park their cars in the neighborhood (especially La Jolla Scenic Drive) and walk to campus. These commuters frequently use the footpath on Site 653 (on the unpayed side of the 8900 La Jolla Scenic North Block); the DEIR does not consider the impact that will be caused by the elimination of this footpath and narrowing the street. The DEIR does not consider the fact that many skateboarders and bicyclists who commute to UCSD frequently do not use sidewalks, and that a narrowing of the street due to ROW will greatly increase the risk of accidents. There AS-10 are two-blind turns at each end of the 8900 Cliffridge block south of Site 653, which poses a danger for the pedestrian and vehicle traffic - the stop sign at the intersection of Cliffridge Ave. and La Jolla Scenic North is frequently not heeded, often putting my family at great risk when we are crossing the intersection or driving out from our garage on La Jolla Scenic North. The DEIR does not take into consideration the increased risk that will be caused by the narrowing of the street.
- AS-11 It is quite likely that the new J. Craig Venter Institute will considerably increase vehicular traffic through the neighborhood and in particular the 8900 Cliffrige and La Jolla Scenic North blocks, which constitute an efficient shortcut to access 1-5. The DEIR does not consider the traffic impact that will be considerably exacerbated by the proposed Project and the ROW.
- AS-12
 8) Existing with Improvements Option is not allowed in a residential zone. The Existing with Improvements option would allow the continued use of 8976 Cliffridge Ave. as administrative space. This is not allowed in the residential, single-family zone. In addition, the proposed construction of 6 parking spaces is not allowed and would significantly affect the character of the
- AS-13 construction of 6 parking spaces is not allowed and would significantly affect the character of the neighborhood. We note that there is not a single reference to a figure/illustration in the relevant Section 9.2, reaffirming our opinion that the DEIR was intended to confuse rather than to guide.
- AS-14

 9) Reduced Project Alternative: All of the issues raised in Items 1-7 would also apply to the Reduced Project Alternative. The only exception is that Reduced Project Alternative would not have any two-story buildings. However, no clear design plans/descriptions/illustrations are provided for this alternative, making it impossible to judge how it would fit into the neighborhood and what its visual impacts would be. Again, we note that there is not a single reference to a figure/illustration in the relevant Section 9.4.

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.

- AS-10 See response to comment AS-9.
- AS-11 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.

AS-12 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.

AS-13 The recirculated EIR (December 2013) includes an updated map with the location of the Site 675 Alternative. See Final EIR Figure 9-2.
AS-14 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.

AS-15

10) Alternative Site(s): A single site (Site 675) was proposed as the sole alternative location for development, however, the same extent of detail provided for Phase 1/Phase 2 project is not provided here, thus creating the impression that it was included just as a formality or an afterthought. Again, there is not a single reference to a figure/illustration in the relevant Section 9.5. The possibility of an alternative that would entail the long-term lease or purchase of a property in a zone that would allow a student center within a reasonable distance from the UCSD campus was not pursued.

I thank you again in giving me and my family the opportunity to address the DEIR and taking the issues we raise into consideration.

Respectfully yours,

Alifage

Akif Tezcan

AS-15

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

Alexander Varon 8955 Caminito Fresco La Jolla, California 92037 (858) 455-6846

March 11, 2013

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

SUBJECT: Draft Environmental Impact Report SCH No. 2010101030

Project No. 212995

UCSD Hillel Center for Jewish Life

Dear Ms. Shearer-Nguyen:

AT-1

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; other times, ignored. Sometimes later sections mention important details or elements that are never mentioned in previous sections. Opinions are sometimes inserted 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)

AT-1 This comment is an introduction to comments that follow. Responses to individual comments are provided in the responses that follow.

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 foiling 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 Varon

	2-1, Paragraph 3: "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)."	AT-2a	The parcels are not separated by the street. APN 344-120-4300 includes the dedicated ROW; the ROW is not a separate legal
AT-2a AT-2b AT-2c AT-2d	 Can two parcels be considered adjacent if separated by a street? Is the proposed ROW vacation included in either of the two listed acreages? If so, what is the true acreages of each property? Who is the owner of 8976 Cliffridge and why are they not listed as party to the applications (pursuant to the San Diego Charter XIV.225)? Can a project spanning two parcels, held by different interests, proceed as a single project? 	AT-2b	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).
AT-3	 2-5. 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." It would be more appropriate to say that the two parcels that comprise the site are separated by a segment of La Jolla Scenic Drive North. 	AT-2c	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.
	2-7, Paragraph 3: "The project site is served by local bus, express bus transit, and a shuttle service "	AT-2d	Projects under CEQA are allowed to span multiple parcels.
AT-4	 Which bus and express bus routes are these? What shuttle service is this? Is this a public shuttle service? 	AT-3	See response to comment AT-2(a).
AT-5	 2-7, Paragraph 4: "as a means to mitigate new development's impact on infrastructure and public services, the City collects Development Impacts Fees (DIFs) from new development." Please include a statement reflecting that nonprofit institutions, such as the applicant, may request a waiver in fees imposed by the City. 	AT-4	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.
AT-6	"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." 1. Would the proposed project be classified as "Residential" or "Commercial/Industrial" Development under the school district fee schedule—or would it be classified as		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.
	something else? 2. Are waivers attainable from the school district? 2-8. Paragraph 5: "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	AT-5	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.
	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):"	AT-6	The project would be subject to the commercial/industrial development fee and would be required to pay all fees in accordance
AT-7	 Isn't this site located at the edge of a CALFIRE Very High Wildfire Risk Zone? Didn't a San Diego City Auditor's report from 2012 find that 90% of emergency response calls averaged nearly 9.5 minutes? 	AT-7	with the City's schedule of DIFs. The project site is located within a Very High Fire Hazard Severity Zones and would be subject to all additional building standards required.

 Didn't the Citygate report, dated February 14, 2011 (adopted by the City Council on November 15, 2011) identify "UCSD" as an important site for an additional fire station?

2-9, Paragraph 4: "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."

AT-8

- 1. How does this ratio compare to that of other cities?
- 2. Are there any statistics for crime in the area?
- 3. How can any conclusions be drawn from this concerning the adequacy of police protection for the site?

2-10. Paragraph 4: "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."

AT-9

- Given the spate of water and sewer line failures throughout city neighborhoods, what is the condition of these pipes? Do they require replacement? When are they scheduled for replacement?
- Is the site serviced by partially-treated, reclaimed water (so-called "purple pipe")? Will it be in the future?

2-11. Paragraph 1: "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."

AT-10

- Given this approaching limit, is it wise to increase the disposal rate through new construction?
- 2. What is the projected amount of waste that this project might generate, both through construction waste and waste generated in the course of operation?
- 2-12, Paragraph 4) "According to the General Plan, the project site is designated as primarily Residential, along with some Park, Open Space, and Recreation."

AT-11

- 1. What is the breakdown and where on the site do they apply?
- 2-12, Paragraph 5: "Development of the project site is subject to the development regulations of the USPD..."

AT-12

- The term "La Jolla Shores Planned District" should be used before the acronym LJSPD is used.
- 2-13. Paragraph 1; "... which allows churches, temples, or buildings for religious purposes,"

AT-7 (cont.)

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.

AT-8 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.

AT-9 DEIR Section 2.4 discusses 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."

The project would be required to attain a waste diversion rate of 75 AT-10 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 vard 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. The General Plan land use maps provide a broad overview of the AT-11 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. AT-12 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.

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." Is this phrase included in the Planning Context sections of any other environmental documents for projects within the LJSPD? Should it be used here? Could such a use in this context be considered prejudicial? 	AT-13	This sentence was revised in the recirculated DEIR (December 2013) to read: "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])."
AT-14	2-14. Paragraph 1: "The City's MSCP study area includes 206,124 acres within the City's jurisdiction." I Is the site of the proposed project included in this area? If not, why is it mentioned?	AT-14	The MSCP area covers 206,124 acres within the City's jurisdiction, including the project site.
AT-15a	3-1, Paragraph 1: "Hillel currently uses the Cliffridge property for administrative offices and one-on- one counseling and meetings with students, but requires additional space in order to fulfill the project objectives listed below. 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 an office/administrative space and construction of temporary parking." 1. If Phase 1 consists of temporary use of the Cliffridge property, how can the applicant	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 AT-15c AT-15d AT-15e	 already be using it? How long has the Cliffridge property been used by the applicant prior to filing an application for the project? Would this use be curtailed if the project were to be denied and no Project Alternatives approved? Does the current use of the Cliffridge property comply with all codes? If not, what non-compliant issues exist and has the property been cited? Has the Cliffridge property ever been used for the current purpose when a proposed project has not been on-file with the City? How many days? Given that institutional memory and will are greater than those of individual residents, how many times may an applicant apply for a project on a given site? How long may a given use be considered "temporary?" 	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.
AT-15f	8. How are the current uses listed, "administrative offices and one-on-one counseling and meetings with students," considered "primarily religious purposes?" 9. Has a Conditional Use Permit ever been approved for the current use? Why or why not? "Upon completion of the HCJL, the temporary use of the Cliffnidge property would expire and revert back to a single dwelling unit use."		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-16	 From which use will the Cliffridge property revert? Has a Change-of-Occupancy / Change-of-Use permit been included in the list of necessary permits? Wouldn't handling such a change ministerially be construed as "piecemealing" under CEQA? Has a change for the current use of the property been issued? 	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.
	$\underline{3-1}$, Paragraph $\underline{2}$: "If the Phase 1/Phase 2 project is not approved, Hillel would permanently use the Cliffridge property."	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.

AT-15f As detailed in Chapter 3 of the EIR, "Hillel currently uses t Cliffridge property to provide religious programs—including meetings, on-on-one counseling, and administrative offices— Jewish students attending UCSD." The Hillel staff at the Cliffridge property the religious programs for Hillel, including property suddents plan programming for their religious life, developin religious work. Students wist the Cliffridge property for religion meetings and to coordinate different aspects. Jewish life on campus. These activities represent a primary religion purpose. While there is a current code violation relating to modificatin necessary for the use (see response to comment AT-15b), Conditional Use Permit would not and has not been required. AT-16 The Cliffridge property would revert from being a religious use to single-family use. A Change of Occupancy/Change of Use is not discretionary action and therefore not listed as such in the EIR. "Piecemealing" has been addressed through CEOA case law, whi holds that "an EIR must include an analysis of the environmen effects of future expansion or other action if: (1) it is a reasonal foreseeable consequence of the initial project, and (2) the fut expansion or action will be significant in that it will likely change the scope or nature of the initial project, and (2) the fut expansion or action will be significant in that it will likely change to propose the project of the initial project, and (2) the fut expansion or action will be significant in that it will likely change to propose the project of the initial project, and (2) the fut expansion or action will be significant in that it will likely change to propose the project of the initial project, and (2) the fut expansion or action will be significant in that it will likely change the proposed project or its environmental effect 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.	luding s—for fridge elping loping to their igious ets of igious et to a not a which nental onably future ge the rects."
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AT-17 AT-18	1. Wouldn't the Existing with Improvement option require approval, separate from denial of the Phase 1/Phase 2 option? "The permanent use of the Cliffridge property would require additional on-site parking to rectify a code violation." 1. Has the property ever been cited for this code violation? If so, when and what was the outcome? If not, why not?	AT-17 AT-18	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. See response to comment AT-15b. This comment represents the commenter opinion and does not
	3-1. Paragraph 4: "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."		relate to the substance or adequacy of the EIR. No response is required.
AT-19	This statement is superfluous, for without such an aim, the project would likely meet the outlined objectives and fail to be approved. 3-2. Paragraph 9: "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 50 to 75 percent diversion (reuse, recycling) of construction and operational waste."	AT-20	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
AT-20 AT-21	Does inclusion of such features affect the permitting process in any way? 3-2, Entire Section: "Project Background" Where is the background on the project itself, the site, and previous proposed projects		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.
	for this site? 2. How many similar projects have been proposed for this site? 3. What were the outcomes of those proposals? 4. How does this project differentiate itself from any prior proposed projects? 5. Why is the proposed project superior to any predecessors? In what ways is it less superior? 6. Can a timeline be provided that includes significant actions related to this or any prior proposals? 3-5. Paragraph 1: "The lead agency would first be required to select either Phase 1/Phase 2 or the	AT-21	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.
	Existing with Improvements option."		response is required.
AT-22	 This sentence should be prefaced with "If the project is approved," as the lead agency also has the discretion to reject both options. What about other project alternatives? 	AT-22	See response to comment AT-17. 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.

	3-5, Paragraphs 2-4; "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 USPD and deviations requested for a Sustainable Building Development • ROW vacation for a portion of La Jolla Scenic Drive North between Torrey Pines Road and La Jolla Scenic Way"	AT-23	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 Phase1/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.
AT-23	Are any easements affected or required? 3-5. Paragraph 5: " deviations from development regulations for a sustainable building project."	AT-24	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).
AT-24	1. What deviations are required for a sustainable building project? The only deviation mentioned is for a curb cut. 3-6. Paragraph 2: "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)."		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.
AT-25a	 This sentence is difficult to read. Are there two ROW vacations (one for the street and one for the cul-de-sac) or only one (encompassing both)? If a ROW vacation were to be granted, given that two property interests are involved, to which interest would such a vacation be assigned? If each interest is to receive a portion of the total area being vacated, why are other properties along the street not included? 	AT-25a	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.
AT-25b AT-25c	4. What is the total area being vacated and how much space does this represent in relation to the existing lots? 5. What effect would the ROW vacation on the current width of La Jolla Scenic Drive North? Where is this explicitly stated in the description? If it is not, why not? • The absence of the information requested in Question 5 does not allow reasonable questions to be asked regarding possible effects of the ROW vacation. "The purpose of the ROW vacation is to enhance 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
AT-26a AT-26b AT-26c	 Will any portion of a building be constructed on property obtained through the proposed vacation? Will any portion of the ROW vacation be required for the project to meet its greenscape requirements? What purpose is served by narrowing La Jolla Scenic Drive North? What current or prospective purposes, such as on-street parking or the Class II Bikeway called for in the La Jolla Community Plan, or even possible uses such as the construction of a pedestrian overpass on this location, would be abandoned in favor granting the land to private control? 		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.

AT-25b	See response to comment AT-2b.
AT-25c	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).
AT-26a	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.
AT-26b	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.
AT-26c	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.

AT-26c (cont.)
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.

	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	A public access easement would be preserved across the pedestrian/bike path.
AT-27a AT-27b	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? What mechanism would be in place to guarantee this access remains? Foot traffic and bicycles may already cross between residential streets and the	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	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-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
	3-8, Paragraph 1: "The Existing with improvements option would require a deviation to provide six on- site parking spaces for employee use."		to comment AT-25a.
AT28	What is the square footage of the Cliffridge property? What is the minimum number of spaces required for the proposed use of the property in	AT-28	The square footage of the Cliffridge property is 1,792 square feet.
	this option? 3. How was the figure of six spaces reached?		Under the Existing with Improvements Alternative a deviation from parking regulations would be required to provide approximately 6
	3-8, Paragraph 2: "Hillel is currently occupying the residential structure on the approximately 0.2-acre Cliffridge property."		parking spaces. The calculation of adequate parking is based on the same evaluation as the proposed project but on a smaller scale.
AT-29	 How long has this property been used for this purpose? Is the current use compliant with all City codes? 	AT-29	See responses to comments AT-15a and AT-15b.
	"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."	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
AT-30	 How long may a given use be considered "temporary?" If the project is not approved, will there ever be a time when this use is not "temporary"? 		Section 9.2.2 discussing the No Project Alternative.
	"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-31	The project permit would be conditioned to obtain a construction permit to convert the property back to single-family occupancy.
AT-31	 How would this be accomplished? Is a permit required? Was a permit approved for the property's current use? 		There is no permit associated with the property's current use. See response to comment AT-15b.
	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-32a	See response to comment AT-2b.
AT-32a	 Is the proposed ROW vacation included in the 0.8-acre measurement? What are the sizes of the site, with and without the ROW vacation? 		The EIR provides an accurate project description (see Chapter 3) in accordance with the requirements of Section 15124 of the CEQA
	"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."		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).

	 This phrasing makes it sound as if a vacant parcel will remain at the completion of the project. Please rephrase. 	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.
	3-15, Paragraph 3: "This would involve bringing the Cliffridge property up to all applicable code equirements for the intended use and occupancy"	AT-33	This comment is not related to the substance or adequacy of the EIR. No response is required.
a s	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, I HCJL 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	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.
	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." 1. Would there be any limits to the number of students who could "drop in?"	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.
AT-35b	 Given that many students park in neighborhoods and then walk or bicycle to campus, would students be allowed to park at the facility while they attend class on campus? How will this be enforced? 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? 		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
9	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."		facility during peak hours. On these limited occasions, attendance at the HCJL could be greater than 100 persons and would trigger
AT-36	 Does this mean that the hours would be different then 9 am to 10 pm? Or is it expected that 9 am to 10 pm would be the standard hours of operation? 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? 		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.
	"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.)." No causal relationship exists between this sentence and the previous one. Please	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.

AT-37	 Does this mean that there could be activities held earlier than 9 am? Should the hours of operation then not be adjusted to 7 am to 10 pm? 	AT-36	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
	3-19. Paragraph 1: "Based upon UCSD Hillel's Winter 2010 quarter program log, of 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,		at special events, there is no intention to have regular meals served or any food services provided.
	 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." 	AT-37	The word "Therefore" was removed in the recirculated DEIR (December 2013). See response to comment AT-38a.
AT-38	1. Would it be fair to extrapolate this data to say that the following would be held each year 368 activities with attendance of 10 or fewer 32 activities with attendance between 11-20 60 activities with attendance between 21-30 40 activities with attendance between 31-40 32 activities with attendance between 41-50? If not, could more data be provided so that the number of yearly activities can be more reasonably considered?	AT-38	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.
	3-19, Paragraph 2: "On rare occasion, such as the opening dedication ceremony or a "welcome back" barbeque, attendance at the HCJL could be greater than listed above, but would not be expected to exceed 100 persons at any one time."		
AT-39	 How common an occurrence is "rare?" Can any data be provided so that a more accurate number may be considered? What is the maximum occupancy of the facility projected to be? Considering its inclusion in a residential zone that is subject to the Campus Impact Overlay Area, would the proposed facility be subject to enforcement of the San Diego Police Department's Community Assisted Party Program (CAPP)? If not, why not? 	AT-39	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
AT-40	3-19, Paragraph 3: "Shabbat services, concerts, high-holiday services, distinguished speaker events, and other large gatherings would continue to be held on campus in rented facilities."		party houses. The proposed project would not be subject to enforcement. Potential noise impacts are analyzed in EIR Section 4.8.
,	 How will the cut-off threshold between these activities and those planned to be held at the facility be decided? Number of attendees? If so, what would this number be? 		
AT-41	Page 3-19, Paragraph 4: "The main entrance to the HCJL student center would be from the central courtyard (see Figure 3-5)."	AT-40	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.
A1-41	1. Where would the main entrance be to the central courtyard itself? Would access be available from all three surrounding streets?	1	
	3-20, Paragraph 2: "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."	AT-41	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.
			Village Drive and would also be a

AT-42

facilities.

AT-42 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 HCJL 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 two or more uses 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?

AT-45b

- 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-46

- 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 canopy/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?

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

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

AT-42 (cont.)

(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.

AT-43 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

AT-43 (cc	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.
AT-44	The information provided for this project cannot be compared to previous projects because of the nature of the project plan and environmental document prepared.
AT-45a	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.
AT-45b	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.
AT-46	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.
AT-47	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.

3-23, Paragraph 1: "Landscaping would also include temporary bike path fencing (to be removed once Phase 2 is completed) and development of a new bus stop on La Jolla Village Drive."

AT-48

- A bus stop already exists at this site: please rephrase to reflect that the bus stop will be replaced and is not, in fact, new.
- 1. Given the heavy traffic conditions on La Jolla Village Drive (noted in the Appendix B, "Traffic Impact Analysis"), was a pop-out ever considered for the bus stop? If so, why was it abandoned?

3-23, Paragraph 2: "Approximately 10,000 square feet of landscaping is required; however, the project would provide nearly 20,000 square feet of landscaped open space."

AT-49

- 1. What percentage of the area vacated by the proposed ROW vacation comprises the final 20,000 sf of landscaping?
- 2. Would the project be able to meet its landscaping requirements if the ROW vacation is not approved?

3-23, Paragraph 4: "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."

AT-50a

- 1. How long would this path be?
- 2. How wide would this path be?
- 3. What precautions have or will be considered regarding potentially impaired visibility at either end of the path?

- AT-50b 4. From Figure 3-10, it appears that the bike path bisects the sidewalk along La Jolla Scenic Drive North before exiting as a ramp to the street. Will any provision be made to protect pedestrians from bicycles flying through to the street?
 - 5. Is it wise to place the access ramp for the bike path in the curve of La Jolla Scenic Drive North? Given the acute angle of the curve between La Jolla Scenic Drive North and Cliffridge Avenue, will drivers already be concerned with watching for oncoming traffic notice bicyclists approaching from the opposite direction?

"A three-seat bench, trash receptacle, and drinking fountain would be located to the side of the bike path..."

AT-51

- 1. Who will maintain them?
- 2. Who will pay for the water at the drinking fountain?
- 3. How far along the path would these be located?
- 4. How visible would these be from either street?
- 5. Will any lighting be provided along the path?
- 6. What security precautions will be taken to deter any illicit activity along this heavily screened length path?

"...blke path signs would be installed at the north and south ends of the path, in accordance with the LISPD signage guidelines."

AT-52

1. How would public access along this path be protected from potential future closure?

AT-48 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.

- AT-49 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.
- AT-50a The bike path would be approximately 110 feet long and approximately 10 feet wide.

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.

- AT-50b 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.
- AT-51 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.

Any lighting along this path would be provided in accordance with City lighting standards.

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.

AT-52 The project would maintain public access, as proposed.

3-23, Paragraph 5: "New and improved landscaping would be provided around the perimeter of the vacant site ..." AT-53 AT-53 This sentence has been revised in the Final EIR: to clarify that the · "New and improved landscaping" sounds as if consideration was given to maintaining the existing landscaping. Please refrain from using "New and improved". landscaping would be new and complement the development. "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 25,644 square feet, and is proposed to contain a planting area of 14,987 square feet (of Torrey pines and other native trees and shrubs)." AT-54 The proposal includes the ROW vacation; therefore, no landscaping AT-54 1. Is this with or without the ROW vacation? calculations without the ROW are required. 2. What would these figures be without the ROW vacation? 3. Why does the footprint of the development in Figure 3-10 appear to be substantially Landscape, including pavers, is not included in coverage greater than 40% of the total site? Are the courtyard pavers being included in this calculation? calculations. Therefore, the courtyard pavers are not included in the footprint calculation. 3-24, Paragraph 4: "There would also be an entrance sign located on a retaining wall." AT-55 This sentence refers to the entrance sign on the southeastern AT-55 1. Which entrance? Following mention of signs regarding the bike path this sounds like portion of the site. another sign at the entrance to the bike path, but there are no retaining walls nearby. AT-56 This sentence is referencing a new easement reservation for the 3-41, Paragraph 3: "A new 15-foot easement reservation for storm drains is proposed in the far proposed storm drain system. This type of easement is not included southeast corner of the vacant site." in Section 3.3 because it is not a discretionary action that is part of AT-56 1. Is this a new easement or is it being relocated from elsewhere? the SDP application. 2. Why isn't this mentioned along with the SDP and ROW Vacation as a requested action? 3. What is the purpose of such an easement? 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. 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 There are no purple pipes serving the property. AT-57a 1. Does this include reclaimed water (purple pipe)? If not, does this mean that irrigation will be using potable water? The City has determined that adequate facilities are available to 2. What are the ages and conditions of these facilities? Will any be replaced during the serve the project. The project would not require the replacement of course of construction? AT-57b 3. Why is the new project referred to as "redevelopment" when no prior development has any public water or sewer mains. ever existed? (This wording also occurs at 3-41, Paragraph 5 and 3-42, Paragraph 1.) AT-57b This sentence was revised in the recirculated DEIR (December "All existing water easements and encumbrances would remain, with the exception of a portion of one water facilities easement to be vacated." 2013). AT-58 1. Why was this easement vacation not included with requested actions? 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.

Encroachment Maintenance and Removal Agreement would be required and final disposition would etermined at time of final map." 1. Is this the same as mentioned in the previous statement or is this separate? 2. With whom would the Agreement need to be made? 3. Why wasn't this included with requested actions? 4. What does final disposition mean? What are the possibilities? Indidition, a temporary water easement along La Jolia Scenic Drive North would be quit claimed by the upon completion of the abandonment a portion of the 12-inch water main." 1. Why wasn't this included in the list of requested actions or, at the very least, included in the discussion regarding the ROW Vacation? 1. Paragraph 5: "No off-site sewer improvements would be necessary, as all sewer facilities assary to provide service to the Phase 2 site exist at sufficient capacity to adequately serve the	AT-59	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.
 With whom would the Agreement need to be made? Why wasn't this included with requested actions? What does final disposition mean? What are the possibilities? Iddition, a temporary water easement along La Jolla Scenic Drive North would be quit claimed by the upon completion of the abandonment a portion of the 12-inch water main." Why wasn't this included in the list of requested actions or, at the very least, included in the discussion regarding the ROW Vacation? Paragraph 5: "No off-site sewer improvements would be necessary, as all sewer facilities 	AT-59	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
upon completion of the abandonment a portion of the 12-inch water main." 1. Why wasn't this included in the list of requested actions or, at the very least, included in the discussion regarding the ROW Vacation? 1. Paragraph 5: "No off-site sewer improvements would be necessary, as all sewer facilities		discretionary action. Therefore, it would not be included in Section
the discussion regarding the ROW Vacation? I. Paragraph 5: "No off-site sewer improvements would be necessary, as all sewer facilities		3.3.
oosed redevelopment."		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.
 What are the ages and conditions of these facilities? Will any be replaced during the course of construction? Please refer to 3-41, Paragraph 4, Question 3. 	AT-60	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.
 Paragraph 1: "Natural gas and water meters would be would be provided for the proposed evelopment." 	AT-61	See responses to comments AT-9 and AT-60.
Please refer to 3-41, Paragraph 4, Question 3.		·
existing overhead utility lines above the Cliffridge property would be relocated into an erground utility easement north of the property easement in Cliffridge Avenue."	AT-62	See response to comment AT-60.
When are the existing overhead lines that service the rest of the neighborhood scheduled to be undergrounded?	AT-63	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.
econd 15-foot-wide drainage and general utility easement is being requested for the far southeast er near the parkway area of the corner of La Jolla Scenic Way and La Jolla Scenic Drive North."		
1. What is the purpose of this easement? 2. Why wasn't this included in the list of requested actions?	AT-64	An existing storm drain occurs within this easement. Only the discretionary actions are summarized in Section 3.3.
2. Paragraph 2: "Grading would entail approximately 3,450 cubic yards of cut and 300 cubic yards		
To where would the 3,150 cubic yards be exported? Is this excessive for a site that is already rough-graded?	AT-65	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.
1 2	What is the purpose of this easement? What is the purpose of this easement? Why wasn't this included in the list of requested actions? Paragraph 2: "Grading would entail approximately 3,450 cubic yards of cut and 300 cubic yards necessitating the export of 3,150 cubic yards be exported?	AT-64 What is the purpose of this easement? Why wasn't this included in the list of requested actions? Paragraph 2: "Grading would entail approximately 3,450 cubic yards of cut and 300 cubic yards necessitating the export of 3,150 cubic yards." AT-65 AT-65

"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." AT-66 The ROW vacation is articulated as one of the required discretionary AT-66 Please clarify that this action is dependent on the ROW vacation being approved. actions for implementation of the project. See EIR Section 3.3.1.3. "All phases of the construction (including the demolition, mass and fine grading, trenching, paying, building, and architectural coating phases) would last 12-18 months." AT-67 The project includes mitigation outlined in DEIR Section 4.3.3.3, AT-67 1. Does this include any construction moratoria, such as pausing construction during raptor breeding season? 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 3-42, Paragraph 3: "Should the SDP for Phase 1/Phase 2 not be approved, the Cliffridge property would be converted to permanent office use for Hillel." area of disturbance. If nesting birds are detected, a letter report or mitigation plan would be required to assure no impacts to the birds. AT-68 1. Isn't this option dependent on approval of the Existing with Improvement Option? See Mitigation Measure BIO-1 for details. "This would involve bringing the Cliffridge property up to all applicable code requirements for the intended use and occupancy." AT-68 See response to comment AT-17. AT-69 Please include a reference to Figure 3-2. 1. Why has the current use of the property been allowed without these requirements? AT-69 The comment regarding the current use of the property does not 2. If the current proposed project is denied, will the current use continue to be allowed raise an issue relating to the substance or adequacy of the EIR. No without these requirements being met? further response to required. 3. How, specifically, would the intended use be categorized? Religious? Office space? Mixed use? If both proposed options are denied, the code violation associated with the religious use would require resolution. 3-42, Paragraph 4: "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." AT-70 AT-70 See response to comment AT-28. 1. How was the number of parking space reached? 2. What is the minimum required number of spaces given the intended use? "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 Cliffridge property." AT-71 The new pedestrian curb ramp on Cliffridge Avenue is a required AT-71 1. Is this required? design feature of the project. The width of the sidewalk would be 2. 2. What is the width of the sidewalk at this location? Five foot, consistent with City-standards. Level passing space would 3. How much level passing space will be provided at this ramp? be five feet, as required under ADA standards. 3-45, Paragraph 1: "The existing stop sign on Cliffridge Avenue at La Jolla Scenic Drive North would also remain." AT-72 1. Would this stop sign be removed under the Phase 1/Phase 2 option? Where was this AT-72 As detailed in EIR Section 3.4.3.1, under the Phase 1/Phase 2 included in that option's description? option the westerly cul-de-sac portion of La Jolla Scenic Drive North would be abandoned and the street would be reconfigured as a 3-45, Paragraph 2: "No other grading or construction actions would be required." 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.

The Final EIR was been revised to include all analysis of the Existing AT-73 AT-73 1. What is the estimated construction time for this option? with Improvements Alternative within the alternatives chapter (Chapter 9.0) of the document. This will create better clarity for the 3-45. Paragraph 4: "Here, a new 22-foot-wide driveway and curb cut would be constructed." reader. As detailed in EIR Section 9.2.1 construction for the Existing with Improvements Alternative would last approximately three to six AT-74a Please mention that the driveway will provide both entrance and egress from the lot. months. 1. Which is correct; this statement or the plans in Figure 3-8, which present a different 2. If the above statement is correct, does the driveway width comply with minimum AT-74a As detailed in Section 3.4.3.1 of the recirculated DEIR (December 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 2013), the driveway would be 24 feet wide. The proposed width would comply with code requirements. As detailed in EIR Section 3. Will turns from the driveway be allowed in either direction? If not, how will this be 3.3.1.1, a deviation from the driveway curb cut requirements of the indicated? AT-74b 4. What provisions will be made to accommodate queuing vehicles on the street? Municipal Code is proposed for Phase 1 only. 5. Will the parking lot be visible from the street? AT-74c 6. What measures will be taken to indicate that the lot may be full? AT-74d The driveway would only be accessible via a right turn, and would 7. What is the speed limit of La Jolla Scenic Way? 8. What is the minimum stopping sight distance of a vehicle traveling at the speed limit? only be exited via a right turn. There is a raised median along La 9. What is the distance between the driveway and the intersection of La Jolla Village Drive Jolla Scenic Way, which would prevent access any other way. and La Jolla Scenic Way? "For adequate sight distance, 25 feet of curb would be painted red just north of the proposed driveway AT-74b There is no expectation of queuing to occur. Any event which the on La Jolla Scenic Way." parking cannot readily accommodate would be subject to a Parking AT-75 1. How many parking spaces will be lost between the driveway and red curb? Management Plan which would require parking at an alternative 2. How was 25 feet arrived at as a distance for adequate sight? location. "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-74c See response to comment AT-48. AT-76 . This sentence does not clearly indicate from which direction bicycles should enter. AT-74d The speed limit of La Jolla Scenic Way is 30 miles per hour. With 1. Is the sidewalk on this (which?) side of adequate width to accommodate both bicyclists and pedestrians safely? 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 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." intersection. The design speed of La Jolla Scenic Way is 30 mph. A sight distance analysis was conducted as seen in the TIA (Appendix AT-77 1. What would be the resulting minimum curve radius? B) of the DEIR. The proposed driveway would require 200 feet of 2. What is the minimum curve radius for a 2-lane collector street? stopping sight distance. There is adequate sight distance (250 feet) "The existing stop sign on Cliffridge Avenue at La Jolla Scenic Drive North would be removed, and a new for vehicles exiting the proposed driveway to see vehicles making an left/curve sign installed on La Jolla Scenic Drive North." westbound-to-southbound left turn from La Jolla Village Drive onto AT-78 1. Why install a curve sign on La Jolla Scenic Drive North and not on Cliffridge Avenue? La Jolla Scenic Way. Vehicles making an eastbound-to-southbound 2. What is the purpose in removing the existing stop sign? right turn from La Jolla Village Drive onto La Jolla Scenic Way would 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? travel at lower speeds due to the turning radius and yielding to

than significant.

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

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.
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.
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.
AT-78	The City would ultimately decide if a curve sign should also be installed on Cliffridge Avenue. Since the "intersection" 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.

	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-79	This sentence was not included in the Recirculated DEIR (December 2013).
AT-80a	1. What is the current width of La Jolla Scenic Drive North? 2. What is the current width of Cliffridge Avenue?	AT-80a	The current width of La Jolla Scenic Drive North is 36 feet. The current width of Cliffridge Avenue is 30 feet.
AT-80b AT-80c	 What are implications of directing through traffic directly into a narrower street? How will the La Jolla Scenic Drive North's width be impacted by the ROW vacation? Why is no mention of this explicitly made either in the ROW Vacation description (Section 3.3.1.3) or here? How is La Jolla Scenic Drive North classified in the La Jolla Community Plan? Would the narrowing of the street to 34 feet constitute a change in street classification 		With respect to the effect of narrowing La Jolla Scenic Drive North, see response to comment AT-25c.
	from Two Lane Connector to Two Lane Sub-Connector, as defined in the San Diego Street Design Manual? 7. Would the change in street classification constitute a change to the Community Plan, thereby requiring a Community Plan Amendment?	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
AT-81	"A strip along the property frontage of La Jolla Scenic Drive would be dedicated to the public right-of- way." 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		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.
	ROW vacation? 3-46, Paragraph 2: "Pedestrians could also access the Phase 2 site along the bike path from Forrey Pines Road/La Jolla Village Drive"	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.
AT-82	 This sounds as if there will be an entrance to the facility buildings from the bike path. Is this the case? If so, why does it not appear on the plans provided; if not, please 		No community plan amendment would be required.
	rephrase. "Once within the Phase 2 site, pedestrians access the central courtyard, which has entries to all buildings as well as the parking area."	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-83	Please clarify, exactly, from which streets or paths entry will be permitted.	AT-82	See response to comment AT-44.
AT-84	 3-47, Paragraph 2: "Phase 1/Phase 2 would also provide permanent bicycle parking facilities" One of the project objectives claims that the facility must be located "close to UCSD to serve students where they live and attend classes." (3-2, Paragraph 3) But if students live so close, what need do they have for permanently storing bicycles at the facility? 	AT-83	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.
		AT-84	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.

AT-85	"an enhanced bicycle and pedestrian path" 1. Currently, bicycles and pedestrians easily traverse the distance from La Jolla Scenic Drive North to the Torrey Pines Road / La Jolla Village Drive intersection. How will this improvement increase such traffic and discourage motorized vehicle use?	AT-85	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.
AT-86	1. Why is no mention made of this under the parking description? 2. What is the definition of a fuel-efficient (vs. a low-emission) vehicle? 3. How many parking spaces will be set aside for low-emission vehicles? 4. Will charging stations be made available? If so, how many? 5. How will this priority be enforced to prevent parking for non-low-emission, non-fuel-efficient vehicles? 3-47. Paragraph 3: "Phase 1/Phase 2 would optimize energy performance by exceeding the current."	AT-86	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
AT-87	building code/2008 Title 24 energy efficiency standards by 17.5 percent." 1. Is this percentage a calculated figure or just an estimate? If a calculation, how was this percentage calculated?		Efficient Economy (ACEEE) annual vehicle rating guide. The proposed project would provide two parking spaces for low-
	3-47. Paragraph 4: "These panels would supply 30 to 50 percent of the on-site energy demand, thus substantially reducing the demand for carbon-based energy."		emission vehicles; however, no charging stations would be available. Enforcement would be through signage referencing applicable municipal code regulations.
AT-88	1. What is the projected total energy demand for the project? 2. What is the rating of the photovoltaic panels projected to be used? 3-48, Paragraph 4: "In compliance with LEED certification criteria and state and City policies, Phase 1/Phase 2 would achieve a 75 percent waste reduction."	AT-87	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.
AT-89	 This appears to be both discordant with and repetitive of the last sentence in 3-48, Paragraph 3. Does this comply with or exceed state and City policies? Which is it? 	AT-88	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).
	3-48, Paragraph 5: "This practice would also increase demand for recycled-content building products and support the sustainable building economy."		
AT-90	How much (percentage?) will this project contribute to supporting the sustainable building economy? Can such a small figure truly be considered a major selling point? 3-48, Paragraph 6: "To minimize operation phase waste, Phase 1/Phase 2 would comply with the City	AT-89	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
	Recycling Ordinance ,"		updated to clarify the project's consistency with LEED silver
AT-91	 Please rephrase the term "operation phase waste". The phrase is confusing, particularly when included in a sentence with the "Phase 1/Phase 2" term. 		requirements.
	200,201-101-101-101-101-101-101-101-101-101-	AT-90	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.
		AT-91	The project would comply with the City's Recycling Ordinance.

	 Are any measures planned to minimize waste beyond required compliance with the City's Recycling Ordinance? 		
	3-49. Paragraph 1: "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."		
AT-92	1. What strategies were used to determine that the landscape plan most effectively maximizes shade and reduces heat island effects?	AT-92	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
	3-49, Paragraph 2: "Based on the energy-efficiency strategy, annual CO2 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 six tons per year."		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).
AT-93	Please refrain from changing the unit of measurement; switching from pounds to tons		1 ian (2mt 19aro 5 10).
	may convey the false impression that photovoltaic panels alone would be responsible for an additional reduction of 6 tons.	AT-93	This was revised the recirculated DEIR (December 2013) to include both pounds and tons.
AT 04	3-49. Paragraph 4: "Since the adoption of the La Jolla Community Plan in 2001, Site 653 has been designated for residential use"	AT-94	The project site's was described under the previous Community Plan as a landscaped area.
AT-94	1. What was the site designated under the previous Community Plan?		·
	"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."		With respect to the property's compliance with codes and regulations, see response to comment AT-15b.
	 Did the renovations allow use of the property in compliance with all codes and regulations? 		
	3-49. Paragraph 5: "The HCIL 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."		
AT-95	 Please include that the 2006 project was called the "'Hillel' Project" and was referred throughout planning documents as a student center. 	AT-95	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.
	3-50, Paragraph 1: "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."		·
AT-96	 Didn't these City Council actions occur in 2006 with the sale of the property? Was there a second project, called "Hillel of San Diego Student Center," brought before the City in 2008? Why is this not mentioned? What were the differences between it and the first project? What was the outcome? 	AT-96	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.
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3-50, Paragraph 2: "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."		
1. Which prior project? Or both?	AT-97	The sentence is referring to changes that have led to the currently proposed Phase1/Phase 2 project.
"The religious programs proposed for the larger facility have been re-envisioned as smaller gatherings and more directed study groups."		proposed Friase 1/Friase 2 project.
1. What enforcement mechanisms will be put in place to ensure that the limitations on gathering size are enforced?	AT-98	See response to comment AT-38a.
3-50. Paragraph 4: "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."		
 What is the scale ratio relative to those of adjacent homes, both along La Jolla Scenic Drive North and along La Jolla Scenic Way? 	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.
3-50, Paragraph 5: "In accordance with the current redesign and lower parking demand, the project currently proposes a surface parking lot that can accommodate the required 27 parking spaces."		
 Was the primary concern over parking with prior project underground vs. surface parking or was it due to the number of parking spaces being provided? Which provision of any applicable land use document states that 27 would be the required minimum for the facility's use? 	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.
3-51, Paragraph 1: "The currently proposed parking lot and street yard would provide a spatial buffer along La Jolla Scenic Way to the multi-family residential development across the street."		With respect to the proposed number of parking spaces, see response to comment AT-45.
1. Why are the homes on the east side of La Jolla Scenic Way characterized as a "multi-family" when, in fact, the La Jolla Community Plan designates it as "Low Density Residential" and the houses are simply attached (vs. detached) Single Family homes?	AT-101	This was corrected in the recirculated DEIR (December 2013) which characterizes the homes across La Jolla Scenic Way as "attached single-family."
3-51, Paragraph 2: "Proposed new landscaping and partial height walls in the vehicular use area visually screen the parking lot from neighbors."		
1. While this is indeed a change from prior projects, how does this significantly change the visual impact of the parking lot when the parking area for previous projects was underground?	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
3-51, Paragraph 3: "Parking tot design 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."		determined to be less than significant.
	environmental concerns raised during the City's review in association with the prior project." 1. Which prior project? Or both? "The religious programs proposed for the larger facility have been re-envisioned as smaller gatherings and more directed study groups." 1. What enforcement mechanisms will be put in place to ensure that the limitations on gathering size are enforced? 3-50. Paragraph 4: "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." 1. What is the scale ratio relative to those of adjacent homes, both along La Jolla Scenic Drive North and along La Jolla Scenic Way? 3-50. Paragraph 5: "In accordance with the current redesign and lower parking demand, the project currently proposes a surface parking lot that can accommodate the required 27 parking spaces." 1. Was the primary concern over parking with prior project underground vs. surface parking or was it due to the number of parking spaces being provided? 2. Which provision of any applicable land use document states that 27 would be the required minimum for the facility's use? 3-51. Paragraph 1: "The currently proposed parking lot and street yard would provide a spatial buffer along La Jolla Scenic Way to the multi-family residential development across the street." 1. Why are the homes on the east side of La Jolla Scenic Way characterized as a "multi-family" when, in fact, the La Jolla Community Plan designates it as "Low Density Residential" and the houses are simply attached (vs. detached) Single Family homes? 3-51. Paragraph 2: "Proposed new landscaping and partial height walls in the vehicular use area visually screen the parking lot from neighbors." 1. While this is indeed a change from prior projects, how does this significantly change the visual impact of the parking lot when the parking area for previous projects was underground?	1. What enforcement mechanisms will be put in place to ensure that the limitations on gathering size are enforced? 3.50. Paragraph 4: "By designing three smaller, individual structures (two one-story buildings and one two-story buildings). Phase 2 would more closely relate in scale to the adjacent single-family residences along to Jolia Scenic Drive North and Cliffridge Avenue." 1. What is the scale ratio relative to those of adjacent homes, both along La Jolia Scenic Drive North and ong La Jolia Scenic Way? 3.50. Paragraph 5: "In accordance with the current redesign and lower parking demand, the project currently proposes a surface parking fot that can accommodate the required 27 parking spaces." 1. Was the primary concern over parking with prior project underground vs. surface parking or was it due to the number of parking spaces being provided? 2. Which provision of any applicable land use document states that 27 would be the required minimum for the facility's use? 3.51. Paragraph 1: "The currently proposed parking lot and street yard would provide a spatial buffer along to Jolia Scenic Way to the multi-family residential development across the street." 1. Why are the homes on the east side of La Jolia Scenic Way characterized as a "multi-family" when, in fact, the La Jolia Community Plan designates it as "Low Density Residential" and the houses are simply attached (vs. detached) Single Family homes? 3.51. Paragraph 2: "Proposed new landscaping and partial height walls in the vehicular use area visually screen the parking lot from neighbors." 1. While this is indeed a change from prior projects, how does this significantly change the visual impact of the parking lot when the parking area for previous projects was underground? 3.51. Paragraph 3: "Parking iot oesign to reduce neighbors' concerns of headlights exiting the project

AT-103 AT-104	1. How is this a reduction when headlights from vehicles exiting the parking lot will still shine directly across the street and the homes along La Jolla Scenic Way are below street grade? 3-51. Paragraph 4: "Redesign of the project such that it no longer includes an underground parking garage or a curb cut deviation." • This assumes that the plans in Figure 3-8 are correct and the statement in Section 3,4.3 is false.	AT-103	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
	3-51. Paragraph 5: "Phase 1/Phase 2 has been designed 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."		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.
AT-105	1. How does this differ from the proposed 2008 project?	AT-104	Both the Figure and EIR text is correct. Figure 3-8 illustrates the curb
	4.1-1, Paragraph 2: "The project site is surrounded by various types of residential and institutional uses."		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
AT-106	 Please change to reflect that the site is surrounded by only one residential use and one institutional use. 		that would include a 12-foot-wide temporary curb cut. Upon occupancy of Phase 2, the Cliffridge property would return to
	"To the east lies La Jolla Scenic Way, Further east are multi-family condominiums and townhomes."		residential use and the 12-foot-wide driveway would be adequate. The final project would have the required 24-foot curb cut as
AT-107	 There are no condominiums or townhomes directly east of La Jolla Scenic Way. Please correct the description. 		illustrated on Figure 3-8.
	4.1-6. Paragraph 4: "According to the USPD 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])."	AT-105	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.
AT-108	1. Why was the full text of the quoted LJ Shores PDO provision not included here?	AT-106	The EIR (December 2013) removed the word "various." The
	4.1-6, Paragraph 5: "The City Manager administers and ensures compliance with the regulations and procedures contained within the LISPD in the manner prescribed herein for both public and private developments. The City Manager also recommends to the Planning Commission any changes to the		paragraph at issue correctly represents the surrounding land uses. No revisions to the Final EIR text are required.
	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 USPD Ordinance."	AT-107	This was corrected in the recirculated EIR (December 2013) which characterizes the homes further east of La Jolla Scenic Way as
AT-109	1. Does the position of "City Manager" still exist after the City's change to a Strong Mayor- form of government? If not, who fills this role?		"attached single-family residences."
		AT-108	This portion of the LJSPDO text necessary to categorize the project was included.
		AT-109	The comment does not raise an issue related to the current substance or adequacy of the EIR. No further response is required.
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4.1-8, Paragraph 3: "The purpose of the right-of-way vacation is to enhance the pedestrian environment through construction of sidewalks and landscaping features."		
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?	AT-110	The project as proposed and designed would not meet the applicable development regulations without the ROW vacation.
$\underline{4.1-9}$, Paragraph 2. "The proposed deviation is appropriate for this location and intended to create a design which is compatible with the adjacent residential scale and setting."		
 Please remove the phrase "is appropriate for this location," as that judgment should be left to the deciding agency. 	AT-111	This sentence was removed in the recirculated EIR (December 2013).
4.1-9. Paragraph 4: "The Campus Parking overlay requirements would limit the surface parking to four vehicles. The Existing with Improvements option would require a deviation to provide six on-site parking spaces for office use. The permanent parking plan for the Existing with Improvements option is designed to accommodate parking along the western edge of the site, iacing 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 heading for this section states that a deviation is required from the Maximum Paving and Hardscape requirement. Why is there no mention—at all—of the Maximum Paving and Hardscape requirement in this discussion? What is the proposed percentage of hardscape for this project? By how much does it exceed the Maximum Paving and Hardscape Requirement? Does the loss of the corresponding required greenscape constitute a significant physical	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.
impact? Why or why not? "The Campus Parking overlay requirements would limit the surface parking to four vehicles."		The project meets the 30 percent landscape requirement and no significant impact would result.
1. Since the intent of the Parking Impact Overlay Zone is to increase off-street parking requirements, how/why does it limit the number of parking spaces?	AT-113	See response to comment AT-115.
"The Existing with Improvements option would require a deviation to provide six on-site parking spaces for office use."		
 How was this number calculated? What is the required minimum parking, using the criteria upon which this calculation is based? What, precisely is the criteria used? 		See response to comment AT-28.
4.1-9. Paragraph 3: "This deviation from development regulations would not trigger significant direct or secondary physical impacts."	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.
Given the conflicting purpose for the requested deviation, how can this be determined?		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.
	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: "The proposed deviation is appropriate for this location and intended to create a design which is compatible with the adjacent residential scale and setting." Please remove the phrase "is appropriate for this location," as that judgment should be left to the deciding agency. 4.1-9. Paragraph 4: "The Campus Parking overlay requirements would limit the surface parking to four vehicles. The Existing with Improvements option would require a deviation to provide six on-site parking spaces for office use. The permanent parking plan for the Existing with Improvements option is designed to accommodate parking along the western edge of the site, lacing 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 paining 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." 1. The heading for this section states that a deviation is required from the Maximum Paving and Hardscape requirement. Why is there no mention—at all—of the Maximum Paving and Hardscape requirement in this discussion? 2. What is the proposed percentage of hardscape for this project? 3. By how much does it exceed the Maximum Paving and Hardscape Requirement? 4. Does the loss of the corresponding required greenscape constitute a significant physical impact? Why or why not? "The Campus Parking overlay requirements would limit the surface parking to four vehicles." 1. Since the intent of the Parking Impact Overlay Zone is to increase off-street parking spac	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: "The proposed deviation is appropriate for this location and intended to create a design which is compatible with the adjacent residential scale and setting." Please remove the phrase "is appropriate for this location," as that judgment should be left to the deciding agency. 4.1-9. Paragraph 4: "The Campus Parking overlay requirements would limit the surface parking to four vehicles. The Existing with improvements option would require a deviation to provide six on-site parking spaces for office use. 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." 1. The heading for this section states that a deviation is required from the Maximum Paving and Hardscape requirement. Why is there no mention—at all—of the Maximum Paving and Hardscape requirement in this discussion? 2. What is the proposed percentage of hardscape for this project? 3. By how much does it exceed the Maximum Paving and Hardscape Requirement? 4. Does the loss of the corresponding required greenscape constitute a significant physical impact? Why or why not? "The Existing with Improvements option would require a deviation to provide six on-site parking spaces for office use." 1. Since the intent of the Parking Impact Overlay Zone is to increa

	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. 	AT-116	See response to comment AT-115.
	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. 	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.
	4.1-11, Paragraph 2: "The LISPD 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."		
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." 	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
	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."		District Ordinance and states the following:
AT-119	1. If the purpose of the project is to provide an inviting entrance to the neighborhood, why wasn't the neighborhood consulted about the design?		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
	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 Laucila Community Plan Transportation System Element, City of San Diego General Plan Mobility Element, and Bicycle Master Plan."		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
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? 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? 		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-122

- 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 LISPD, 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."

AT-123

- 1 What is the point of including this passage?
- Why are other provisions, such as those discussing area character or design principles and requirements, not mentioned?
- 4.1-12, Paragraph 2: "Specifically, Municipal Code Section 1510.0303(a) 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

 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?
- 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-124c

What is the full text of the Municipal Code Section 1510.0303(e)?

5. Why is no mention made of a Conditional Use Permit as being necessary?

AT-124d

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 assessory 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.

AT-124c	The Municipal Code Section is excerpted below:
	§1510.0303 Single-Family Zone - Permitted Uses
	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
	(e) Churches, temples or buildings of a permanent nature, used primarily for religious purposes.
	The project is an allowable use under this code section. See response to comment AT-46.
AT-124d	A Conditional Use Permit is not required for approval for either the Phase 1/Phase 2 or the Existing with Improvements Alternative.

6. Is a Conditional Use Permit planned for the facility? If so, what would it include and shouldn't it 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

1. How can this claim be made without reference to the Conditional Use Permit required by Municipal Code Section 1510.0303(e)?

"The vacant site associated with Phase 2 is relatively flat, thus would not require the cutting of steep slopes."

AT-126 * Please include something like "..., with the exception of the cut required to site the parking lot."

"Phase 1/Phase 2 would accommodate all required parking on-site."

AT-127a

1. Can it be determined that the parking requirement (including the methodology used to calculate the number) for the project complies with all provisions of the La Jolla Shores

 The project claims permitted use on the basis that it is a religious facility. Municipal Code Section 1510.0303(f)(1) requires compliance with Land Development Code Chapter 14, Article 2, Division 5. Does this division include parking requirements for religious facilities? Why were they not used?

AT-127b

3. Municipal Code Section 1510.0303(f)(2) lays rules for cases where any use not specified is found to be a permitted use. If the requirements set forth in the Land Development Code do not apply, why was this provision of the La Jolla Shores PDO not implemented?

4. If, as is claimed in Section 3.4.2.1(e), there are no specific parking regulations for the proposed use of Phase 2 and there are no similar uses in the La Jolla Shores Planned District as described in Municipal Code Section 1510.0303(f)(2), wouldn't Municipal Code Section 1510.0401(e) apply? If not, why not?

AT-127C

5. Does the partial retaining wall and landscaping mentioned in Section 3.4.2.1(e) meet the requirements laid out Municipal Code Section 1510.0401(o)?

 How have the requirements laid out by Municipal Code Section 1510.0401(p) been satisfied (independent of plantings used for the screening required in Municipal Code Section 1510.0401(e)?

4.1-13, Paragraph 2: "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."

AT-128

1. Which side of the project is considered "the front?"

AT-127d

2. What will the street address of Phase 2 be?

3. Can the parking lot truly be considered "off to the rear" in a three-sided property?

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.

AT-129	4.1-13, Paragraph 3: "The site is predominately flat, with manufactured slopes at the north and west property edges." • Please replace "west" with "east."	AT-129	This tout was revised in the regimentated FID (December 2012)
	WW. 6		This text was revised in the recirculated EIR (December 2013).
	 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." 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? 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? 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? 	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.
	 4.1-14, Paragraph 4: "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." What is the maximum height determined from finished grade? Would a calculation of maximum height from finished grade conflict with guidelines set forth in the La Jolla Shores Design Manual? 	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	 4.1-14. Paragraph 6: "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." 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 in 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 to the houses." This principle would be adopted into Phase 1/Phase 2 with the design of the reconfigured La Jolla Scenic Drive." 1. Does this mean that La Jolla Scenic Drive North will be narrowed? 2. Couldn't 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? 	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. 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 Design Manual states "design all curves, intersections and cul-de-sacs and their relationships to houses for the best visual effect." "

AT-134

 The Street Design Manual says this in the context of general street alignment. Two sentences later, it says, "For example, use should be made of long radius curves connected by short curves in aligning streets rather than long tangents connected by short sharp curves."

"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."

AT-135

- 1. Wouldn't the elimination of the cul-de-sac result in two long tangents connected by a short sharp curve?
- Why would the elimination of the cul-de-sac provide a better visual effect? Couldn't the surrounding grounds be cleaned up and landscaped without the ROW vacation?

4.1-15, Paragraph 3: "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."

AT-136

- Section 3.4.2.1(g) states, "There would also be an entrance sign located on a retaining wall," which suggests one sign placed on an existing retaining wall, yet the above passage mentions two. How many signs will there be?
- Will the ground sign actually be mounted on a necessary retaining wall or will if be a sign in-and-of-itself, perhaps as an unutilized extension of a retaining wall?
- 3. Why is the ground sign not shown on any of the elevations?
- 4. What will the ground sign say?
- 5. How large will the ground sign be?
- Could a large sign reading "UCSD Hillel Center for Jewish Life" mistakenly lead people to believe they are entering the UCSD campus?
- 7. Near which entrance will the wall sign be located?
- 8. How large will the wall sign be? Will it be legible from the street? What will it say?
- 4.1-15, Paragraph 5: "As noted above, the project site is located between institutional uses and a major roadway and a suburban neighborhood with primarily single-family residences."

AT-137

- Please include that the site is separated from institutional uses by a major roadway and that no institutional use similar to those at UCSD is currently permitted or operates in the neighborhood.
- Please remove the word "primarily," as the only residences in the neighborhood are single-family.

"On a day to day basis, typical site activities would consist of small religious study groups, lectures, morning prayer, 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 student center that could accommodate up to 50 people... [sic] As discussed in Chapter 3, Project Description, the HCIL is intended as a space for learning, community-building, and spiritual counseling."

- AT-134 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.
- AT-135 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.

AT-136 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.

AT-137 The referenced text was removed within the recirculated EIR (December 2013).

AT-138	 Is the site zoned for residential or institutional use? 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? 	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.
	 Will the facility be open to the general public or is it strictly for student use? Where is this stated anywhere in the document? 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? 		Programming at the facility would be geared towards Jewish student use; however, it would be open to the public.
	"Based on the size of the facility and the hours of operation, the activities would not result in significant direct or secondary environmental effects."		The proposed use is allowed within the project site. See response to comment AT-46.
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? Where in this section is there any discussion related to hours of operation? What, specifically, are the hours of operation? 	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.
	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 HCJL would operate Monday-Friday, 9:00 a.m. to 10:00 P.M. and as needed on weekends. Therefore, impacts would be less than significant."	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-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	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.
	Cliffridge property for the Hillel administrative offices for religious uses, which is an allowable use."	AT 4441	The sector time and the sector beat at 10000 Commence to
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	AT-141b	The project is an allowable use under the LJSPDO. See response to comment AT-46.
AT-141b	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 <i>purpose</i> or <i>intent</i> of the use, why isn't such reasoning carried to its		The LJSPDO does not state that religious uses must serve the residents of the zone in which it is located.
AT-141c	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?	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
	"Therefore, the Existing with Improvements option would be consistent with the zoning of the USPD."		decisions makers.
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?	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.

4.1-16, Paragraph 3: "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."

AT-143

- 1. How was the determination made that the proposal meets all required parking on-site?
- What is the required parking? How was this determined? Where in the document is this detailed?

"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."

AT-144

- In attempting to draw a similar conclusion, discussion regarding the Phase 1/Phase 2 option at least mentions hours of operation. Where is that discussion here?
- The activities listed here 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. Given 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?
- 4. Will the facility be open to the general public or is it strictly for student use? Where is this stated anywhere in the document?

4.1-16. Paragraph 4: "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, LISPD ordinance, La Jolia Shores Design Manuai, 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."

AT-145

- Please consider revising to address the lack of discussion regarding a Conditional Use Permit and other points raised regarding this section.
- 4.1-17, Paragraph 1: "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, USPD ordinance, and development regulations."

AT-146

 Please consider revising to address the lack of discussion regarding a Conditional Use Permit and other points raised regarding this section.

4.2-5, Table 4.2-1: "c[.] 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."

AT-147

- . The median of La Jolla Scenic Way is raised, not striped.
- Proper analytic technique recommends maintaining the same units of measure and a single standard baseline against which to measure. Therefore, capacities should all be

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 indication, all study intersections currently operate at an acceptable LOS (LOS D or better)."
- AT-149

 1. Is any consideration given to delays cause 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

 1. 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

 1. 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.

minutes during peak hours and 15 minutes during non-peak hours (between 9:00 AM and 3:00 PM and in the evening)."

- AT-152 1. This sentence conveys the impression that the SuperLoop is a shuttle, possibly exclusively serving students. Is this the case or is the SuperLoop a full public MTS bus route?
 - 2. Does the SuperLoop directly service the project site?
 - 3. What is the distance to the nearest SuperLoop stop from the project site?

4.2-8, Paragraph 6: "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)."

AT-153 • This paragraph appears to have been repeated from Paragraph 3 on the same page.

4.2-9, Paragraph 2: "There are no local or national established trip generation rates for a facility such as this project."

- AT-154 1. Why wasn't the City of San Diego Development Services Department's own Trip Generation used for this purpose?
 - 2. If the use of the facility is to be "Religious," wouldn't such a use fall under the Trip Generation Manual classification of "House of Worship," which is described as "a house of worship such as a church or synagogue may include a school, a day-care center, meeting rooms, a ministerial residence, and various other activities" (Trip Generation Manual, rev. 2003, Appendix C1? If not, why not?
 - 3. If the facility cannot fully be considered to fall under the "House of Worship" categorization, isn't it standard practice to apply a similar use calculation? Why was this
 - 4. If the use of the facility does not qualify as "Religious" for the purposes of trip generation, why should this qualification justify its permitted use within a Single-Family Residential zone?

"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."

- AT-155 1. To which programs does this sentence refer? How do they relate to the "administrative offices and one-on-one counseling and meetings with students" mentioned as activities in the existing occupation of the Cliffridge property?
 - 2. How many programs are held? How often? How many attend?
 - 3. Would these programs be held at the facility proposed in the Existing with Modifications option? If so, shouldn't they be listed in Section 3.4.2.2?

"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

AT-152	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.

- AT-153 This paragraph was deleted in the recirculated EIR (December 2013).
- AT-154 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.

AT-154 (cont.)

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.

AT-155 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.

such close proximity to campus as the project (directly adjacent to campus), they are good candidates from which to collect trip generation data."

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

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.

> "In addition, to determine appropriate parking generation rates, surveys were also conducted at UCSD, UCLA, UCSB, and California State University, Northridge (CSUN)."

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?

4.2-9, 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 data set? If a different set was obtained, what was the methodology and sample size used?

"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 5 percent of those students responded that they would carpool."

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 students attending multiple activities and responding to the survey multiple times?
- 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?

4.2-9. Paragraph 4; "The UCLA Hillel facility is located approximately the same distance from the university campus as the proposed HCJL"

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 this facility zoned? What is the nature of nearby residential use?
- 4. What is the availability of off-site parking, including nearby on-street parking?

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.

- 5. What are the percentages of on- and off-campus housing, and where are these types of housing found in relation to the UCLA facility?
- 6. Is the parking at the UCLA facility controlled in any way (gate, etc.)?

"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."

AT-161

- 1. What is the margin of error for this survey?
- 2. Were these unique visitors or could the survey include results of single students responding to the survey multiple times through attendance of multiple events?

4.2-10, Paragraph 2: "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."

AT-162

 If the parking spaces are reserved for staff, how can this sample properly reflect visitor vehicular use?

"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."

AT-163

This conclusion is not supported by the evidence presented: it merely indicates that the
facility may have an adequate parking supply for staff only—if and only if there are no
more than 13 staff members on the premises at any given time. Please correct.

4.2-10. Paragraph 3: "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."

AT-164

- What is the zoning for this facility and the surrounding neighborhood? How does this compare with the SFR use of the neighborhood surrounding the proposed project?
- 2. What is the availability of off-site parking, including nearby on-street parking?
- 3. What are the percentages of on- and off-campus housing?
- 4. Is the parking at the UCSB facility controlled in any way (gate, etc.)?

"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."

AT-165

- 1. What is the margin of error for this survey?
- Were these unique visitors or could the survey include results of single students responding to the survey multiple times?

4.2-10, Paragraph 4: "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."

- AT-161 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.
- AT-162 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.
- AT-163 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.
- AT-164 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 Santa Barbara. These comments do not raise an issue related to the content or adequacy of the EIR.

AT-165 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.

AT-166

- 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 = .667]. Is this a fair interpretation?
- <u>4.2-10, Paragraph 5</u>: "The CSUN Hillel Student Center 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."

AT-167

- What is the zoning for this facility? What is the nature of the surrounding residential use (SFR, etc.)?
- 2. What is the availability of off-site parking, including nearby on-street parking?
- 3. Is the parking at the CSUN facility controlled in any way (gate, etc.)?

"Survey data was not collected at this facility."

AT-168

1. Was there any reason for this?

"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."

AT-169

- 1. How many "free" parking spaces were observed to be occupied?
- 2. Are there any plans for the proposed project to charge affiliated students for parking?

"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."

AT-170

- 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 made available to non-Hillel related vehicles as if it were a paid-parking facility?
- 3. Is a public, paid-parking facility a permitted use for the proposed site?
- 4. 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?
- 4.2-11, Paragraph 1: "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."

AT-171

1. How does this jibe with the statement in Section 3.4.2.1(b) which says, "On rare occasion, such as the opening dedication ceremony or a "welcome back" barbeque, attendance at the HCJL could be greater than listed above, but would not be expected to exceed 100 persons at any one time"?

- AT-166 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-45X for details on the calculation of parking.
- AT-167 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 Northridge. These comments do not raise an issue related to the content or adequacy of the EIR.

- AT-168 See the response to comment AT-160.
- AT-169 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-170 Habits of student parking are outside the scope of the CEQA analysis for this project. Parking at the Hillel facility would not be available for outside use. The facility would self-monitor the lot to assure it is used for its intended purpose. The project does not require a Conditional Use Permit.
- AT-171 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.

		1	
	"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.—2:00 P.M."		
AT-172	 Given the statement referenced above from Section 3.4.2.1(b), this does not appear to be conservative at all. Please rephrase. 	AT-172	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).
	4.2-11, Paragraph 2: "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."		
AT-173	1. Was this guide provided with this environmental document? Where is it?	AT-173	The monthly program guide was provided as an appendix to the Traffic Impact Analysis.
	"The hours of operations proposed are between 9:00 A.M. and 10:00 P.M. Monday through Friday."		Traine impact Analysis.
AT-174	 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.)"? 	AT-174	See response to comment AT-39.
	"As previously mentioned, all events are proposed to take place at the new facility except for the Shabbat services, which will continue to be held at the UCSD International Center."	AT-175	The sentence has been revised in the Final EIR to clarify that other
AT-175	1. What about other large gatherings, such as concerts, high-holiday services, and distinguished speaker events?	7	large gatherings such as concerts, high-holiday services, and distinguished speaker events would be held off-site.
	4.2-11, Paragraph 3: "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 HCIL."		
AT-176	 Without information regarding the margins of error, consideration regarding other factors that could influence an individual's decision to walk or drive (proximity of housing, availability of on-site visitor parking, access to parking—including price), and the possibility of potential duplicate responses from repeating, single students (biasing the data), the result is suspect and should not be relied upon. 	AT-176	See the responses to comments AT-47 and AT-157.
	"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 80 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."		
AT-177	 Are 80 percent walking or are 80 percent driving? Why is it proper to assume two persons per vehicle for 100 percent (or even 80 percent) of vehicles driving to the site when the sample size is so small (and potential margin of error is so high)? 	AT-177	See the responses to comments AT-47 and AT-157.

n 3: "Access to the vacant site associated with Phase 2 would be provided by a right- ay on La Jolla Scenic Way." d no left turns be allowed?	AT-178	
1/Phase 2 would be conditioned to install a stop sign on the Caminito Deseo		There is a raised median along La Jolla Scenic Way that would prevent left turns in or out of the project site driveway.
tersection." Deseo is a private street on private property. What right does one property apose terms on another? onsideration been given to the fact that Caminito Deseo is the <i>only</i> and access point for the neighborhood of 128 homes?	AT-179	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.
n.4: "An "existing plus project" analysis has been provided for the Phase 1/Phase 2 to the recent case of Sunnyvale West Neighborhood Association v. City of Sunnyvale to ensure that the traffic study includes an analysis of the existing plus project assuming either additional cumulative projects or additional road improvements in ion."		The traffic impact includes volumes within this neighborhood utilizing Caminito Deseo.
ence is confusing and unclear to those unfamiliar with the details of the case ase explain what the case requires of the proposed project.	AT-180	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.
n 1: "As seen in Table 4.2-5, the following study area segments are calculated to F with the addition of Phase 1/Phase 2 traffic: illage Drive between Torrey Pines Road and La Jolla Scenic Way – LOS E nes Road between La Jolla Village Drive and Glenbrook Way – LOS E"		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
Scenic Way were to be analyzed using the LOS capacity appropriate to its sification (rather than the arbitrarily determined 15,000), would it be included?	AT-181	significant. It would be included on the list if an inaccurate 10,000 ADT (2-lane)
1 2: "The volume to capacity (V/C) increase due to the project at these two street of exceed the 0.02 threshold."	AT 101	capacity was used to analyze this 4-lane road.
ld the V/C delta be for La Jolla Scenic Way if analyzed with its street ion LOS capacity?	AT-182	The volume over capacity increase would be less than 0.02 second, even if a capacity of 8,000 was utilized.
n. 3: "Since many students currently walk to/from the UCSD campus utilizing the Jolla Village Drive / Torrey Pines Road and La Jolla Village Drive / La Jolla Scenic Way, estrians collected in the peak hour intersection count data were included in the peak		
6 does not appear to include any pedestrian-specific data. How is this adata represented? Where?	AT-183	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).
Jolla estr	a Village Drive / Torrey Pines Road and La Jolla Village Drive / La Jolla Scenic Way, Jans collected in the peak hour intersection count data were included in the peak oes not appear to include any pedestrian-specific data. How is this	a Village Drive / Torrey Pines Road and La Jolla Village Drive / La Jolla Scenic Way, ians collected in the peak hour intersection count data were included in the peak open not appear to include any pedestrian-specific data. How is this

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;

AT-184

a. Clinical and Technical Research Institute (CTRI) located on the UCSD East Campus Medical Center in the Health Sciences Neighborhood proposes construction of a 360,000-gross-squarefoot building with 2.880 ADT.

 East Campus Bed Tower proposes to expand the existing Thornton Hospital which would generate 4,900 ADT.

c. Sulpizio Cardiovascular Center is constructed and generates approximately 823 ADT. d. East Campus Office Building is currently under construction and would generate approximately 457 ADT."

- Why was the Ventner Institute, currently under construction across Torrey Pines Road from the Cliffridge property, omitted from this list?
- Three other projects are anticipated to be developed next to the Ventner site. What is the timeframe for these projects and should they be included in the Near-Term forecast?

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 LOS for the existing plus near-term traffic scenario."

AT-185

- How would the inclusion of the Ventner Institute, which will only utilize a right-in/right-out driveway along Torrey Pines Road, affect the traffic patterns?
- Since Torrey Pines Road is shown to currently operate at LOS E, would it be
 unreasonable to expect outbound traffic from the Ventner site seeking to use La Jolla
 Village Drive to use Glenbrook Way/Cliffridge Avenue/La Jolla Scenic Drive North/La
 Jolla Scenic Way as a way to avoid making a U-turn at Torrey Pines Road/Glenbrook
 Way and having 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.

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..."

AT-187

Please refer to Question 1 for 4.2-16, Paragraph 1.

4.2-23. Paragraph 4: "As shown, all key signalized intersections are calculated to operate at LOS D or hetter."

AT-188

1 How might this be affected by the inclusion of the Ventner project?

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.

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.

- 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.

Under the "all walk" scenario, the project would not add any vehicle AT-189 4.2-26, Paragraph 1: "The Traffic Impact Analysis also includes a near-term peak-hour analysis under trips to the roadway system. EIR Figure 4.2-2 accurately represents an "all walk" scenario." this scenario. The "all walk" scenario was analyzed at the request of 1. Where are the figures for this analysis? the City of San Diego due to prior community comments regarding AT-189 2. Was an analysis made under an "all drive" scenario? A "50-50" scenario? Why would it the large amount of pedestrian activity which occurs at the La Jolla be any more unreasonable to analyze such scenarios than it would an "all walk" Scenic Way/La Jolla Village Drive intersection. scenario? A 50-50 scenario and a 100 percent drive scenario was not 4.2-26, Paragraph 2: "Year 2030 traffic volumes were determined for conditions both with and completed in the EIR. The 100 percent scenario was not considered 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." reasonable to occur due to the subject facility being directly across from the UCSD campus. However, a 100 percent drive scenario 1. Were any known future projects that were not used in the Near-Term calculations AT-190 included in the 2030 traffic impact analysis? was analyzed in response to comments and the results are shown in Attachment 2. No significant impacts to the circulation system would "Since the SANDAG Year 2030 model contains the existing project site land uses (residential recreation), occur under this scenario. these volumes were used in the "without project" scenario." What does "residential recreation" use mean? AT-191 AT-190 Projects throughout the La Jolla community that are not currently built were assumed to be built per the Community Plan designation 4.2-26, Paragraph 4: "Under the Year 2030 without Phase 1/Phase 2 scenario (left half of table), the in the Year 2030 analysis. following segments are calculated to operate at LOS E or F ..." AT-192 Please refer to Question 1 for 4.2-16, Paragraph 1. AT-191 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. 4.2-29, Paragraph 2: "As shown in the table, the following segments are calculated to operate at LOS E or Fin Year 2030 with Phase 1/Phase 2 ..." AT-192 See response to comment AT-184. AT-193 Please refer to Question 1 for 4.2-16, Paragraph 1. AT-193 See response to comment AT-184. 4.2-32. Paragraph 1: "There would be no increase in the number of staff or activities at this location with the Existing with Improvements option. Thus, no increase in traffic would occur. Therefore, project AT-194a Under the Existing with Improvements Alternative Hillel would traffic from the Existing with Improvements option would be less than significant." permanently use the Cliffridge property. Under the Phase 1/Phase 2 AT-194a 1. Previous statements in this document indicate that the current use of the Cliffridge project, the use of the property would be temporary until occupancy property is "temporary." Is this true? 2. Was a Traffic Impact Analysis prepared and approved for this temporary use? permits are issued for the Phase 2 buildings. 3. Isn't the Existing with Improvements option meant to bring the property up to code and to pave the way for a legal change of use? AT-194b 4. How can a determination that no increase in traffic (and thus no impacts) would occur The Traffic Impact Analysis prepared for the project adequately when measured against a non-compliant, temporary use without a proper permit? analyzed the Phase 1/Phase 2 project and the Existing with 5. Shouldn't the baseline be set to the single-family use of the house prior to its temporary Improvements Alternative (see EIR Appendix B). occupation by the applicant? The Existing with Improvements Alternative provides an alternative project to the Phase 1/Phase 2 project which would result in

Municipal Code.

permanent on-site parking and other improvements to the interior of the structure to bring the Cliffridge property into compliance with the

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AT-195 AT-196	4.2-32. Paragraph 2: "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." 1. Could the same conclusions be reached 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)? 2. Are any of these conclusions dependent on the questionable conditioned inclusion of a stop sign at Caminito Deseo?	AT-195	The volume over capacity increase would be less than 0.02 second even if a capacity of 8,000 was utilized. The capacity of La Jolla Scenic Way is independent of the stop sign at Caminito Deseo.
	4.2-32. Paragraph 3: "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."	AT-196	See response to comment AT-187.
	 Omission of the Ventner project (and possibly 3 other large projects nearby) makes these conclusions questionable. 		
	4.2-32, Paragraph 4: "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."		
AT-197	 Could inclusion of the three large, unnamed projects called for in the UCSD LRDP near the Ventner project affect these conclusions? 	AT-197	See response to comment AT-187.
	4.2-32, Paragraph 5: "There would be no increase in the number of staff or activities at this location. Thus, no increase in traffic would occur. Therefore, project trips from the Existing with Improvements option would be less than significant in all scenarios."		
AT-198	Please refer to Questions 1-5 for 4.2-32, Paragraph 1.	AT-198	See response to comment AT-197.
	4.2-33. Paragraph 3: "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."		
AT-199	 Section 3.4.2.1(b) indicates that some activities may include up to twice this number. Which statement is correct? 	AT-199	Please see the response to comment AT-47 for comments related to trip generation.
	4.2-33, Paragraph 4: "Currently, no specific parking minimum or maximum requirements exist for this type of facility in the City's Municipal Code."		
AT-200	1. Doesn't the project claim the right to build on the site because of religious use?	AT-200	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.

- 2. Doesn't the Municipal Code provide specific parking regulations for religious use?
- 5. 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?
- 6. Doesn't the La Jolla Shores PDO require the similar use rule to be applied where ambiguity exists regarding off-site parking requirements?
- 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?
- 4. Doesn't the La Jolla Shores PDO require that minimum parking requirements be totaled for each use when two or more uses exist?
- Given the several potential methods for calculating required parking given in the previous questions, why should this statement be considered correct?

"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."

AT-201

1. How often are proposed projects allowed to determine their own parking requirements?

4.2-33, Paragraph 5: "The UCSD survey of existing Hille! members found that approximately 80 percent of the students stated in their response that they would walk to the Hille! facility at its proposed location."

AT-202

- 1 What is the margin of error of this survey?
- Could the data have been biased by the students attending multiple events and completing multiple surveys?
- 3. 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?

"Using the results of this survey, if 50 students were to attend a typical event, 20 percent would drive (10 vehicular trips). Of the 20 percent of students who would drive, or 10 potential vehicular trips, half would carpool (five total vehicular trips)."

AT-203

- 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 = 0.5 (rounded to 1) trip?
- 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."

AT-204

 If the number calculated in Question 2, above, were to be valid, wouldn't this number be 22 spaces [(100 x .15) + 7 = 15 + 7 = 22] instead of 17? 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.

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	2. If the error rate calculated in Question 1 for 4.2-10, Paragraph 4 for UCSB (66.7%, the only error rate available from the provided data) were to be applied, wouldn't this yield a total of as many as 37 spaces necessary for the project?		
	4.2-33, Paragraph 6: "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 the activities planned."		
AT-205a	UCLA facility is described? 2. If the UCLA student center is most similar to the proposed project, wouldn't it be proper to refer to the proposed project as a student center itself? If not, how can the two facilities be similar? 3. Is a student center a permitted use in a single-family residential zone?	AT-205a	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.
AT-205k	4. How the UCLA facility zoned? 5. What are the surrounding land uses and how do they compare with surrounding land use for the proposed project (low density / single-family residential)? What is the nature of the residential use nearby to the UCLA facility?		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
AT-2050	 What is the availability of off-site parking, including nearby on-street parking? What are the percentages of on- and off-campus housing, and where are these types of housing found in relation to the UCLA facility? Is the parking at the UCLA facility controlled in any way (gate, etc.)? 		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.
	4.2-34, Paragraph 1: "The 13 parking spaces provided at the UCLA facility are primarily reserved for staff members. Because the majority of students walk, and the remainder carpool, the facility has an adequate parking supply."	AT-205b	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.
AT-206	 This conclusion is not supported by the evidence presented; it merely indicates that the facility may have an adequate parking supply for staff only—if and only if there are no more than 13 staff members on the premises at any given time. Please correct. If such a conclusion could be reached, what does this have to do with minimum parking 	AT-205c	See response to comment AT-163.
	requirements for the proposed project? 4.2-34, Paragraph 2: "The UCSB Hillel Student Center is approximately 10,000 square feet and is	AT-206	See response to comment AT-165.
	located just off-campus in the Isla Vista community, which is predominately a student housing area."		
AT-207	 How is this comparable with the SFR zone surrounding the proposed project? What is the availability of off-site parking, including nearby on-street parking? What are the percentages of on- and off-campus housing? Is the parking at the UCSB facility controlled in any way (gate, etc.)? 	AT-207	See response to comment AT-167.
	"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."		
AT-208	1. Considering the dissimilarity between the surrounding neighborhoods, what does this have to do with the minimum parking requirements for the proposed project?	AT-208	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.

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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?	AT-209 See response to comment AT-211.
4.2-34, Paragraph 4: "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 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, et al.) are the same for every other student center as they are for the proposed project?	AT-210 See response to comment AT-45.
"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 See responses to comments AT-207 and AT-45.
 AT-211 Can this conclusion reasonably be reached when the calculations presented on page 4.2-33, Paragraph 5, may be incorrect? Can this conclusion reasonably be reached when similarity to other facilities is based on only some factors while other significant factors are ignored? How was the final number of 27 spaces actually decided upon? 	AT-211 See responses to comments AT-207 and AT-45.
4.2-34, Paragraph 5: "There are currently seven parking spaces on La Jolla Scenic Drive North."	AR-212 This information was corrected in the recirculated EIR (December
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?	2013) to reflect that La Jolla Scenic Way had seven parking spaces, not La Jolla Scenic Drive North.
"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?	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
"This would result in a loss of five on-site parking spaces." AT-214 • Perhaps the first line of the paragraph should be rewritten to state that the project would	proposed pathway would be used by recreational cyclists and would not create any safety issues (see EIR Section 4.2.5.1).
eliminate 7 parking spaces?	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.

"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 siting 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 motorvehicle 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."

- 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-218 See responses to comments AT-45, AT-162, AT-163, AT-164, AT-167, AT-168, AT-169, AT-170, AT-172, and AT-173.
- AT-219 See response to comment AT-197.

AT-221	1. This only makes the case that pedestrian and bicycle movement will remain unimpeded during construction. How would these features decrease any traffic hazard impacts to the point of insignificance? 1.2-36. Paragraph 1: "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." 1. How much greater are the traffic counts on La Jolla Scenic Way compared to La Jolla Scenic Drive North? 2. Isn't it wiser to install driveways on streets with lower levels of traffic?	AT-220	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.
V	 1.2-36, Paragraph 2: "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 Nay Intersection, which is visible from the proposed driveway location." 1. How can a distance of 150 feet provide adequate sight distance when the minimum stopping distance is 200 feet? 2. Considering that stopping distance is dependent on sight distance, wouldn't it make sense to calculate sight distance as from the intersection to the driveway rather than from the driveway to the intersection, as is done here and in the Traffic Impact Analysis? 3. Considering that northbound La Jolla Scenic Way slopes downward and westbound La Jolla Village Drive slopes upward, what is the difference in elevation between the left-turn lane of westbound La Jolla Village Drive and the proposed facility's driveway? 4. Why isn't the difference in elevation addressed by this document or the Traffic Impact Analysis? Would other calculations from the Caltrans Highway Design Manual apply because of the slope? 5. Figure 14-1 of the Traffic Impact Analysis shows the sight line to the westbound lane of La Jolla Village Drive passing through a single vehicle in the left-most northbound lane of La Jolla Scenic Way, indicating a possible obstruction. Added to the difference in elevation between the intersection and the proposed project's driveway, queued traffic in this (or other lanes) represents a very real obstruction scenario. Does the Caltrans Highway Design Manual address such obstructions and why was this not addressed by the Traffic study or this document? 6. The Figure 3-8 indicates an angled wall at the northeastern corner of the site (the southwestern corner of the La Jolla Village Drive /La Jolla Scenic Way intersection) with an apparent deflection from La Jolla Village Drive of just less than 45 degrees. Given that the distance from the sate	AT-222a AT-222b AT-222c	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. See response to comment AT-77d. 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. 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. The existing wall on the southwest corner of the La Jolla Village Drive/La Jolla Scenic Way was taken into account in evaluating the sight distance at the project driveway. 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.

AT-222e	considering that vehicles would accelerate through the turn to compensate for the upward slope of the street in this direction? 8. Would 150 feet be sufficient stopping distance for a vehicle making an obstructed turn near the 30 mph speed limit? 9. Given that the parking lot will be screened from the road, that entrance to the lot will require a 180-degree turn, that the non-circulatory nature of the parking lot may require vehicles to initiate two- or three-point turns in order to turn around, and that many of the visits will be generated through programming events (thus attracting visitors in waves, rather than a steady stream), is it unreasonable to consider that some vehicular queuing may occur as a result of the time necessary to determine which spaces may be open or, failing that, delaying others as they turn around? 10. If queuing at the entrance were to occur, wouldn't this shorten the allowed stopping distance from vehicles approaching from the La Jolla Village Drive/La Jolla Scenic Way intersection?	AT-222e	As the parking would accommodate use of the facility, queing is not expected to occur.
	"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."		
AT-223	This sentence is gratuitous since drivers exiting the driveway should look northbound regardless of which direction they intended to turn.	AT-223	This comment does not raise any issues related to the substance or adequacy of the EIR. No further response is required.
	"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)."		
AT-224	 Please note that northbound traffic on La Jolla Scenic Way is signalized in two phases within a single cycle: the left-turn onto westbound La Jolla Village Drive, and the right-turn (two lanes) onto eastbound La Jolla Village Drive which is both concurrent with the left-turn phase and a green-arrow while westbound traffic from La Jolla Village Drive turns left (in two lanes) onto southbound La Jolla Scenic Way. This makes a strategy based on concurrent action dependent on the awareness of a driver exiting the driveway to recognize, from a perpendicular angle, the traffic patterns of three lanes of traffic. Would exit from the driveway be controlled in any way that corresponds with left-turn, northbound traffic or would this strategy be left up to individual drivers to puzzle out? Wouldn't the available gap time also be one of the most opportune times for a vehicle traveling eastbound on La Jolla Village Drive to make a right turn onto southbound La Jolla Scenic Way, the direction with the least available sight distance? 	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.
	4.2-36, Paragraph 3: "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."		
AT-225	 What are these "additional traffic measures" other than the legally-dubious stop sign on Caminito Deseo? Doesn't the necessity of additional traffic measures indicate an impact significant that mitigation is required? 	AT-225	See response to comment AT-182.

4.2-36. Paragraph 4: "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."

AT-226

- A continuous sidewalk already connects the southwest corner of Cliffridge Avenue/La Jolla Scenic Drive North to Torrey Pines Road. How would the new configuration improve pedestrian and bicycle routes?
- How would narrowing La Jolla Scenic Drive North by two feet improve bicycle routes, particularly in light of the future Class II Bikeway called for in the La Jolla Community Plan?
- 3. How would a path, exiting directly at the outside apex of an acute curve and encouraging bicycle riders to take to the street with an easy access ramp, not pose a traffic hazard?

4.2-37. Paragraph 1: "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."

AT-227

1. Why was this information not included in the Project Description?

4.2-37, Paragraph 3; "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."

AT-228

1 How would the non-inclusion of this feature create a more significant impact to traffic hazards to motor vehicles and bicycles?

4.2-37. Paragraph 4: "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."

AT-229

- Please revisit, given the lack of consideration for the deficient sight and stopping
 distances of oncoming traffic, no measures to handle queuing vehicles attempting to
 enter the parking lot, and the questionable right of one property to impose its mitigation
 measures (stop sign at Caminito Deseo) upon another.
- 1 Doesn't the requirement of additional traffic measures at the La Jolla Scenic Drive/Caminito Deseo suggest an attempt to mitigate an impact?

4.2-37. Paragraph 5: "The improvement detailed above would ensure that traffic hazards to motor vehicles, pedestrians, and bicycles would be less than significant."

AT-230

- Please rephrase, as the improvement ensures no such thing; the improvement would only have little to no impact.
- 4.3-1, Paragraph 4: "Onsite plant species include sea fig (Carpobrotus chilensis), wild oat (Avena fatua), ripgut grass (Bromus diandrus), Australian saltbush (Atriplex semibaccata), sourclover (Melilotus

AT-226 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.

AT-227 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 -contigu primary walkway into the facility would be from a pedestrian path entry at La Jolla Village Drive.

AT-228 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.

AT-229 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.

AT-230 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.

indica), filaree (Erodium sp.), and Russian thistle (Salsola tragus). One eucalyptus (Eucalyptus sp.), two ornamental pines (Pinus sp.), and one Mediterranean fan palm (Chamaerops humilis) occur along the perimeter of the site."

- AT-231 1. Why are the ornamental pines referred to as Torrey pines in other sections of this
 - 2. If these two pines are, indeed, of the Torrey species, why are they not identified as
 - 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.
 - 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 CDFG, 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 ADD of the Entitlements Division."
- AT-236 1. What is the "ADD of the Entitlements Division?" What authority does this carry?

- AT-231 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.
- AT-232 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.

AT-233 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).

- AT-234 See the response to comment AT-235.
- AT-235 See the response to comment AT-235.

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
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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.

		1	
	4.5-10, Paragraph 4: "Educational/school uses generate approximately 0.0013 ton per square foot per year (CalRecycle 2009)."		
AT-243	 Isn't the declared use of the facility to be primarily religious? Why is educational/school use considered the standard here? 	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
	4.5-11. Paragraph 5: "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."		because they are the closest available data type use to the proposed use.
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?	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.
	4.6-9, 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 as this sentence is confusing with a prepositional phrase separating the verb from the conjunctive subject. 	AT-245	The Final EIR was revised to clarify that the City determined a GHG analysis was necessary.
	4.6-10. Paragraph 2: "Phase 2 would generate 118 ADT (LLG 2011)."	AT-246	This was revised in the recirculated EIR (December 2013) to match
AT-246	1. Does this match the estimates claimed in Section 4.2?		the discussion in EIR Section 4.2.
	4.6-11. 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?	AT-247	The project would be required to comply with the parking regulations, but in this case a deviation is being requested.
	4.6-15, Paragraph 1. "The Existing with Improvements option would not expand or intensify the existing structure, operations, or vehicle traffic."		
AT-248	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?	AT-248	See response to comment AT-247.
	4.8-2, Paragraph 4: "Three measurements were made at the project site. Figure 4.8-1 shows the		
AT-249	locations of these measurements."	AT-249	As detailed in the Noise Technical Report (GHG Appendix G), noise
A1-249	When (date and time) were these measurements gathered?		measurements were taken at the project site on February 11, 2008.
		1	

AT-250

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 (HV/AC, etc.) noises?
- 2. What is the projected noise level generated by the proposed facility's utility equipment?
- 3. Where would this equipment be located?

4.8-8, Paragraph 2: "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 (Linscott, Law & Greenspan, Engineers 2011)."

- AT-251
- 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.
 - 4.11-2, Paragraph 9: "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."
- 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?"

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.

AT-254	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.
AT-255	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.

AT-256	4.11-7, Paragraph 1: "Phase 1/Phase 2 would incorporate LID IMPs where feasible to minimize impervious surface areas and promote infiltration and evaporation of on-site runoff." 1. What are "LID IMPs?"	AT-256	See response to comment AT-258.
	4.11-9, Paragraph 3: "It shall be the responsibility of the owner to execute a maintenance agreement with the City that meets the City's requirements."		
AT-257	1. Would this maintenance agreement be included in the Conditional Use Permit required for the facility?	AT-257	The project does not require a CUP. This agreement is typically executed during construction permit review.
	4.11-10. Paragraph 2: "Because the parking lot would be in a location where the garage and deck were once located, there would not be a substantial increase in impervious surfaces and associated runoff."	AT-258	See response to comment AT-255.
AT-258	Please refer to 4 10-6, Paragraph 4.	AT-259	This sentence was revised in the recirculated EIR (December 2013) as follows:
AT-259	4.12-2. Paragraph 3: "A two-story multi-family condominium and townhome development, built in the mid-1970s, lies across La Jolla Scenic Way to the east." • The community to the east is better characterized as a single-family planned unit development (PUD) providing a mixture of one- and two-story attached homes, built in		A single-family home (attached, multiple units) development, built in the mid-1970s, lies across La Jolla Scenic Way to the east.
	the early 1970s. Please remove all reference to multi-family condominiums and townhomes as this is a mischaracterization of the neighborhood.	AT-260	As required under CEQA Guidelines Section 15125(a):
AT-260	"A large undeveloped lot belonging to UCSD is located across Torrey Pines Road to the west." • Please note that this "lot" is actually four properties, three of which are undeveloped. The fourth is currently being developed as the Ventner Institute.		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.
AT-261	4.12-2, Paragraph 4: "As shown in Figure 4.12-1, the undeveloped site is largely covered with disturbed grasses and dirt foot trails." • This image misrepresents the undeveloped site. The actual lot comprises the smaller triangle defined by La Jolla Village Drive to the north, La Jolla Scenic Way to the east, and a line parallel with La Jolla Scenic Drive North, running roughly from the where the dirt foot path intersects with La Jolla Scenic Way (just south of the eucalyptus tree) in the east to the north-westernmost point in the large patch of iceplant (not including the separated point to the west) along La Jolla Village Drive. The rest of the undeveloped		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.
	site would be part of the ROW vacation. 4.12-16, Paragraph 4: "The Phase 2 building height would be consistent with the LDC, Coastal Height Overlay Zone, and the Design Manual, and would not exceed 30 feet."	AT-261	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.
AT-262	What is the actual building height?	AT-262	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.
			the Design Manual.

	"The Phase 2 building coverage is consistent with the LDC, LISPD, and the Design Manual, and would not exceed 50 percent of the lot."	AT-263	The recirculated EIR (December 2013) contained the following additional information:
AT-263	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."		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	 Why isn't a deviation for parking being requested, considering that the calculations would not comply with requirements set forth in the Municipal Code? 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? 	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.
AT-265	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." 1. Does this comply with the requirement that walls screening parking lots shall have a		All of the applicable design regulations are adequately detailed in EIR Section 4.12. Impacts were determined to be less than significant.
	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	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	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?	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
	4.12-18, Paragraph 3: "The building coverage would be consistent with the LDC and LISPD and would not exceed 60 percent of the lot."		would not be adjacent to other residences, the curb cut would not be out of character with the surrounding neighborhood.
AT-267	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-267	The proposed lot coverage for the Existing with Improvements Alternative would be 27 percent.
AT-268	 What are the required setbacks with regards to the neighboring residence at 8973 Cliffridge Avenue? What is the effective landscape coverage for the lot with this option? 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? 	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.

4.12-20, Paragraph 7: "The neighborhood is suburban in character, with one- and two-story singlefamily residences to the south, a multi-family condominium and townhome development 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."

AT-269 • Please change "multi-family condominium and townhome development" to something closer to the truth, like "a planned unit development with one- and two-story attached

"Each playhouse seats upwards of 400 people and has a building square footage in the range of 6,500."

AT-270 •

- There is no reason to include this, as the buildings constitute part of the institutional use by the University of California. The proposed project is situated, however, in a residential zone.
- If this sentence is retained, please include other important aspects, such as a setback from the street of more than 100 feet and no vehicular access from the adjacent streets.

4.12-22, Paragraph 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 multi-family condominiums to the east."

AT-271 Please change "multi-family condominiums" to "single-family attached homes,"

4.12-22, Table 4.12-1.

AT-268 (cont.)

The parking lot has a clearly marked turnaround area at the end of the aisle, as specified in the LDC.

AT-269 The recirculated DEIR (December 2013) was revised to include the following information:

> The neighborhood is suburban in character, with oneand two-story single-family residences to the south, oneand 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.

- AT-270 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.
- AT-271 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.

TABLE 4.12-1 NEIGHORHOOD BULK AND SCALE SURVEY

Unit	Building SF	Lot SF	Bedrooms/ Baths	Year Built
1 (Existing Cliffridge		1000		100
Property)	1,740	7,800	3/2	1958
2	2,338	8,000	3/2	1958
3	1,817	8,000	3/2	1959*
4	3,469	8,000	4/4	1970
.5	2,424	8,400	4/3	1958
6	1,655	8,000	3/2	1958
7	3,464	9,200	4/4	1980
8	1,818	10,000	3/2	1961
9	2,336	9,800	3/2	1962
10	1,724	8,800	3/2	1960
11	2,458	8,500	4/3	1962
12	2,030	8,000	3/2	1961
	1,410 to	Condo		
13	1,692	Townhome	3/2 or 2.5	1974
Average	2,273	8,542		

SF = square feet

AT-272 •

Row 13 is in error: since the structure in question is part of a PUD, each home and the lot on which the home is built is individually owned. If these were listed individually:

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13	1,410	2,770	3/2	1974
14	1,668	2,200	3/2.5	1974
Average	2 168	7.676		

If the two homes were considered a single structure and the lot areas combined: 3,078 4,970 Average 2,335 8,267

[Building SF taken from original floor plans:

 Single Story, 3 bedroom: 1,410 sf o 2-story, 3 bedroom (small): 1,668 sf *

o 2-story, 3 bedroom (large): 1,692 sf

o 2-story, 4 bedroom: 1,824 sf

*Both www.zillow.com and www.trulia.com erroneously report the two-story home at this location to be the larger of the two 3-bedroom floor plans. The Building SF for the single story home, which lies closest to the proposed project, is correct.

Lot sizes reported by www.trulia.com]

1. Why were setbacks not surveyed for comparison?

4.12-22, Paragraph 2: "The two-story condominium and townhome units have shared walls and occur in larger structures composed of two to four units."

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.

^{* =} original owner

		AT 070	The sector late LEID (December 2040)
AT-273	 This is in error: each attached home shares a single wall with its neighbor, occurring in a single larger structure of two units. No four unit structures exist. 	AT-273	The recirculated EIR (December 2013) was revised to include the following information:
	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."		The attached single-family homes have a shared wall and occur in a single, larger structure.
AT-274	 It should be noted that the homes directly to the east of the proposed site are sited approximately four to fifteen feet below grade from La Jolla Scenic Way, resulting in a much lower profile. 	AT-274	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.
	"The 3,682-square-foot student 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-unit condominium structures east of La Jolla Scenic Way."	AT-275	The recirculated EIR (December 2013) was revised to include the following information:
AT-275	There are no four-unit condominium structures east of La Jolla Scenic Way.		Tollowing information.
AT-276a	4.12-23. Paragraph 3: "The three structures would be clustered, and when combined their total gross square footage of 6,459 would exceed the average size of existing single-family homes, but would be comparable to the size of one of the La Jolla Playhouses." 1. How does the zoning and use of the La Jolla Playhouse site compare to that of the proposed project?		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.
AT-276b	2. What is the setback of the La Jolla Playhouse structures from La Jolla Village Drive?	AT 2760	The Le Jelle Dlaybourge is within the DC 1.14 zone and is designated
AT-276c	Village Drive?	AT-276a	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.
AT-276d AT-276e	Jolla Playhouse site?	AT-276b	The setback of the La Jolla Playhouse structures from La Jolla Village Drive is approximately 100 feet from La Jolla Village Drive.
	Arterial roadway, create a strong visual separation between UCSD's institutional use and the residential character of the neighborhoods south and east of the proposed project site? 8. What purpose is served to extend the feel of institutional use into the residential		The setback of the project site from La Jolla Village Drive would be approximately 50 feet.
	neighborhood? "Given that the clustered design incorporates open spaces between the structures and a large open	AT-276c	The structures are approximately 425 feet above mean sea level (AMSL), while La Jolla Village Drive is approximately 375 feet AMSL.
	central courtyard, the resulting sense of scale is minimized and the bulk of the project would not be out of scale or monotonous."	AT-276d	Vehicular access to the La Jolla Playhouse site is from Scholars
AT-277	 While the sense of scale could be argued to be minimized, this does not mean that the bulk would scale appropriately with the neighboring residential structures. Please 	711 2700	Drive South, off Gilman Drive.
	elaborate.	AT-276e	The La Jolla Playhouse is not being used as a justification for the
	"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."		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 party of the visual survey. As detailed in EIR Section 4.12.1, the project would be consistent with the
			sits within the adjacent residential neight Playhouse is approximately 350 feet north of therefore included as party of the visual sur

AT-277 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.

AT-278 The recirculated EIR (December 2013) was revised to include the AT-278 • I'm afraid I don't see this effect from the provided elevations. Perhaps rewording this following information: sentence to read something like, "It is the intent of the project's design to appear interrelated but separate, with views extending through the site's open pathways and spaces." This will allow decision-makers to decide for themselves. As shown in the project building elevations in Figures 3– 12A-B, it is the intent of the design that when the 4.12-23, Paragraph 6: "The vacant site associated with Phase 2 could be considered to be in a structures are viewed from adjacent streets and houses, transitional area, where suburban residential development borders more intense multi-family and major they would appear interrelated but separate, with views roadways and institutional uses (Figure 4.12-4)." extending through the site's open pathways and spaces. AT-279 • No nearby multi-family use exists. The neighborhood to the east is zoned single-family residential, and is developed with attached single-family homes. Please omit this AT-279 The recirculated EIR (December 2013) was revised to include the following information: "While the character of the neighborhood to the south is low-density and post-war, the character of the area to the east is denser and of a compact, urban nature, and the area to the north is of an institutional The vacant site associated with Phase 2 could be character with large utilitarian structures." considered to be in a transitional area, where suburban residential development borders attached single-family AT-280 • While the lots of the neighborhood to the east are indeed smaller than those of the neighborhood to the south, the area can hardly be described as of a "compact, urban homes, major roadways, and institutional uses (Figure nature." No other uses exist other than single-family residential, streets are nestled on 4.12-4). steep hillsides and separated by isolated, wooded walking paths, dense stands of trees, and lush landscaping. AT-280 The Recirculated EIR (December 2013) removed the statement relating to "compact, urban nature." The remainder of the paragraph 4.12-25, Paragraph 6: "The siting of the parking lot and street yard would provide a spatial buffer is accurate and no revision to the Final EIR is required. along La Jolla Scenic Way to the multi-family residential development across the street." AT-281 • Please replace "multi-family" with "single-family." AT-281 "Multi-family" was replaced with "single-family" in the recirculated 1. Is a parking lot often considered to be an attractive buffer between properties? EIR (December 2013). 4.12-27, Paragraph 1: "Some features of the project design could also be seen as enhancing The parking lot would be landscaped and a partial height wall would neighborhood character, such as the provision of Torrey pine trees along La Jolla Village Drive and La provide a visual screening. 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 provision of a community service," AT-282 This sentence has been revised in the Final EIR to clarify that the AT-282 1. To which community service does the last item in this list refer? characters of the landscape design. 4.12-27, Paragraph 2: "Two existing Torrey pine trees currently exist on-site and would be considered symbols of the community." AT-283 1. What does this mean? The two existing Torrey pine trees are in no way emblematic of The recirculated EIR (December 2013) was updated to state that the AT-283 tree species on-site are not Torrey pines, but are in fact ornamental 2. Doesn't Section 4.3.1.1(a) refer to these trees as "two ornamental pines (Pinus sp.)"? pines. Which species are they?

4.12-27. Paragraph 4: "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."

AT-284

The curvature and slope of La Jolla Village Drive actually do make this property stand
out significantly. This street view from Google, looking westbound on La Jolla Village
Drive at the intersection with La Jolla Scenic Way shows that the site takes up
approximately one entire quarter of the view.



4.12-30. Paragraph 7: "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. The project would 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."

AT-285

 It would seem that the "3,450 cubic yards of cut" and the fact that "the project would result in a change in elevation of steep hillsides" might meet the City's Significance Determination Threshold a.3 as spelled out on page 4.12-29. Is this correct?

4.12-32, Paragraph 4: "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."

AT-284 The EIR states that the site is visible from La Jolla Village Drive.

AT-285 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.

- AT-286 Please rephrase, as this conveys the sense that walls and landscaping will shield the headlights cars which are in the act of exiting the parking lot, whereas actually they might only shield lights from cars occupying the marked parking spaces.
 - 1. What about the headlights of vehicles exiting the parking lot shining directly across La Jolla Scenic Way into 2nd story bedrooms (since the homes on the east side of La Jolla Scenic Way are on a lower elevation)? Why wouldn't this be considered the shedding of substantial light onto adjacent, light-sensitive property or land use (single-family residential)?
 - 5-2, Paragraph 2: "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 "

AT-287

- 1. Since the current use is "temporary," shouldn't the baseline for consumption be single-
- 6-1, Paragraph 4: "Thus, the project would not induce population growth."

AT-288

- 1. Who would maintain ownership of the Cliffridge property should the Existing with Improvements option be approved? Is there a chance that the applicant may not reside in the house in perpetuity?
- 2. If the use of the Cliffridge property were to revert back to single-family after the modifications listed under the Existing with Improvements options have been made, would the inclusion of a large parking lot not be an inducement to using the home for a mini-dorm?

"Furthermore, the HCIL does contain any elements that would stimulate economic growth or the need for additional housing."

AT-289

- Please elaborate or rephrase.
- 6-2, Paragraph 3: "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."

AT-290

- Why are they not registered with the university?
- 2. Can a group that is not even affiliated with the university use "UCSD" in its name, as this facility purportedly will?
- 6-2, Paragraph 5: "These deviations do not pertain to the type of use that would be allowed, but rather to the technical development regulations."

- AT-291 1. Isn't the deviation for the Existing with Improvements option necessary because the change of use to offices requires additional parking?
 - 6-3, Paragraph 1: "Therefore, development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively,"

AT-286 This sentence is correct as written. The walls would provide some shielding; no revision to the EIR is required.

> With respect to impacts from light and glare of exiting cars, see response to comment AT-106.

- AT-287 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.
- AT-288 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.
- AT-289 The project does not have any housing component, nor would it require additional housing.
- AT-290 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.
- AT-291 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.

AT-292a

- 1. How long has "temporary use" of the Cliffridge property been going on?
- Are there many proposed projects that go to the City which allow an unpermitted, noncompliant temporary use for nearly 10 years?

AT-292b

- 3. Since the temporary use is considered part of the planned development, wouldn't it be fair to say that the City's lenience toward the lengthy, unpermitted, non-compliant temporary use could, in fact, be precedent setting and encourage others, including student groups, to seek "temporary" status while dangling development possibilities for potential projects?
- 4. If this is not intended to set precedent or to be an allowed tactic by others, could it not be construed that the applicant is receiving special treatment?

AT-293

- 7-3, Paragraph 3: "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 (CTRI) 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.
 - East Campus Bed Tower proposes to expand the existing Thornton Hospital which would generate 4,900 ADT.
 - c. Sulpizio Cardiovascular Center is constructed and generates approximately 823 ADT.
 - d. East Campus Office Building is currently under construction and would generate approximately 457 AOT."
 - · Please refer to questions asked for 4,2-20, Paragraph 4.
- 7-4, Paragraph 4: "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."

AT-294

- · Please refer to 4.2-20, Paragraph 4.
- 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."

AT-295

- 1. 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?
- 7-6, Paragraph 4: "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."

AT-296

1. What about conversion from single-family use to "temporary" use?

AT-292a 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.

AT-292b 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.

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.

- AT-293 See response to comment AT-187.
- AT-294 See response to comment AT-187.
- AT-295 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 (d	cont)
/ \ 1 200 (C	cont.) the Cliffridge property was used primarily for religious purposes, and no increase in traffic would occur.
	the Cliffridge property was used primarily for religious purposes, and
	no increase in traffic would occur
AT-296	See response to comment AT-298.
711 200	200 respense to comment / 11 200.

	7-7, Paragraph 1: "In the project vicinity, cumulative noise impacts would generally be attributed to increases in traffic volumes."	AT-297	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
AT-297	1. What about times when traffic noise is not so loud, such as in the evening and early morning hours?		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
	7-9, Paragraph 2: "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."		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.
AT-298	1. Since the parking lot would encompass the majority of the backyard, wouldn't the impervious surfaces in the back of the house nearly double?		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
	7-10. Paragraph 1: "The project would comply with relevant height, bulk, and coverage regulations. The site plan, architecture, and scale of the project have been designed in consideration of the		due to the project.
	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	AT-298	See response to comment AT-255.
	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	AT-299	See response to comment AT-280.
	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."		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.
AT-299	 These sentences do not even discuss potential cumulative impacts; they merely reiterate the selling points of the proposed project. Doesn't 4.12, Paragraph 3 mention that the proposed project would exceed the size of 		Nonetheless, as discussed above, visual impacts associated with bulk and scale would be less than significant.
	neighborhood homes, but justifies the size because of facilities on the UCSD campus? If the project were to be included in Table 4.12-1, would it skew the average square footage higher? Wouldn't such changes in bulk suggest a cumulative effect toward increasing the size and character of the structures in the neighborhood?	AT-300	This paragraph states that pursuant to CEQA, the No Project Alternative cannot be the Environmentally Superior Alternative. Therefore, another alternative must be so identified.
	9-2. Paragraph 4: "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."		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.
AT-300	 Does this mean that the No Project Alternative will never be selected? What is the point of including a No Project Alternative if it is not really an alternative? 	AT-301	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:
	9-2, Paragraph 5: "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."		Site 653 was also evaluated for potential incorporation
AT-301	 When the original project was proposed in 2006, this site was City-owned. While the court did allow the sale of the property to stand, it rejected the approved project, 		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.

requiring that an Environmental Impact Report (this document) to be prepared. Considering this, please include more information regarding the park proposal as it was originally suggested before the City's sale of the land to provide a more comprehensive picture of the situation.

9-3, Paragraph 3: "While there may be other sites that meet these criteria, they are not in the applicant's ownership."

AT-302

- The applicant did not own the land when it initiated the first project in 2006. Why is this
 a factor now?
- 2. Does ownership of land provide the indubitable right to develop it?

9-3, Paragraph 7: "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."

AT-303

- Is the applicant's ownership of the property part of the project objectives? Where is this listed?
- The applicant does not own the Cliffridge property—does this mean that it does not meet project objectives?

9-4. Paragraph 1: "Leasing space would also not provide the environment conductive to religious study and meditation or accomplish the same design goals and character of indoor and outdoor spaces outlined in the project objectives."

AT-304

- This is not necessarily the case; such concerns are site-dependent and would only need
 to be considered on a case-by-case basis. For example, the site once held by El Torito
 Restaurant on Villa La Jolla Drive, while meeting nearly all of the other project
 objectives, it would also provide outdoor space in the form of a walled courtyard.
- 9-5. Paragraph 2: "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."

AT-305

- If projected traffic conditions were to remain the same as single-family use, why is it necessary for additional parking?
- If the current "temporary" use is contingent on application for the period, doesn't this mean that the original use—single-family—should be considered the baseline for traffic?
- 3. Why was no assessment of traffic impact related to this option included in this document?

9-5, Paragraph 3: "There are no sidewalks along La Jolla Scenic Drive North."

AT-306

This is untrue. A contiguous sidewalk runs the length of the southern side of the street.
 A sidewalk also provides direct pedestrian (and bicycle) access to Torrey Pines Road.
 These can be seen in Figures 4.12-2 and 4.12-5.

AT-301 (cont.)

The project does, however, provide enhanced pathways, extensive landscaping, and a park-like amenity that would all be available to use by the public.

AT-302 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.

AT-303 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.

- AT-304 Leasing space would not allow Hillel to provide a permanent space as it would be at the mercy of the lessor.
- AT-305 The Existing with Improvements Alternative would not increase traffic; however, additional parking would provide spaces for visitors that were parking off-site.

AT-305 (con	nt.) 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.

	9-9, Paragraph 4: "Furthermore, the No Project Alternative would not maximize use of land owned by the applicant"	AT-307	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.
AT-307	 Ownership of land does not imply the right to develop such a site solely to the owner's wish. 	AT-308a	A description of the No Project Alternative has been revised to clarify
AT-308a	9-9. Paragraph 5: "The 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." 1. What are the possible outcomes of such a required resolution with the City?		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
AT-308b AT-308c	 What is to prevent the applicant from retaining "temporary" use while a new project is proposed? Would it not be more reasonable to measure the No Project Alternative against the 		described in the revised portion of Final EIR Section 9.2.1.
	Existing with Improvements option since both would retain use of the Cliffridge property?	AT-308b	See response to comment AT-311a.
	9-10, Paragraph 2: "However, there are no sidewalks along La Jolla Scenic Drive North."	AT-308c	CEQA requires the analysis of alternatives compared to the
AT-309	See comment for 9-9, Paragraph 4.		proposed project. Both the Existing with Improvements Alternative and No Project Alternative are analyzed in comparison to the
	9-13, Paragraph 3: "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."		proposed project within Chapter 9 of the EIR.
AT-310	 This short description does not provide much opportunity to fully evaluate this alternative. Please elaborate. 	AT-309	See response to comment AT-309.
	9-14. Paragraph 1: "Overall, impacts under the Reduced Project Alternative would be slightly reduced when compared to Phase 1/Phase 2, as the site would not be able to accommodate the same amount of people."	AT-310	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.
AT-311	 What would the impacts on parking be? Would a parking lot be required? If so, where would it be placed? What would be the overall capacity of the facility in this alternative? 		Specifically, EIR Section 9.2.3 states the following:
AT 040	9-16, Paragraph 5: "The design of the Reduced Project Alternative provides a reduced scale, more similar to the surrounding single-family residential uses."		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
AT-312	 This suggests that the Phase 1/Phase 2 option is not as similar as Section 4.12 proposes. In what ways would this alternative be "more similar" to single-family residential uses than the Phase 1/Phase 2 option? 	-	the second floor, and the other would be 1,813 square feet of GFA). Compared to the Phase 1/Phase 2 project
	"This alternative * [sic] would have less visual impacts due to the increase in landscaped areas compared to that of the 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

AT-310 (cont.)

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

- AT-311 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.
- AT-312 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.

AT-313	1. Would this be the only area of potentially reduced impacts? What about scale?	AT-313	This section was revised in the recirculated EIR (December 2013) to state the following:
AT 044	9-17, Paragraph 1: "The intention of this alternative is to locate the proposed Hillel facilities on an alternate site—Site 675—the only vacant and available City-owned site in La Jolla."		The design of the Reduced Project Alternative provides a reduced scale, more similar to the surrounding single-
AT-314	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		family residential uses. This alternative would consist of two one-story buildings of similar architecture style and
AT 045	and Gilman Drive, surrounded by UCSD lands."		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-315	 On which corner of the intersection is this site located? Could a map and satellite/street view be provided for the area? 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 Osler Lane, which is on the UCSD campus. From Osler Lane, construction of a road of several hundred feet through a grove of mature eucalyptus	AT-314	There is no requirement that an alternative project site be owned by the City.
AT-316	trees would be required."	AT-315	The recirculated EIR (December 2013) included a map that shows
A1-316	 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 Ostler Lane? 		the location of Site 675 Alternative. See Figure 9-1.
	9-19, Paragraph 2: "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. Impacts to historical resources would be considered significant."		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
AT-317	 Given the proximity of the two sites, wouldn't the likelihood of finding prehistoric or historic cultural resources be similar? Why should the impacts for the Site 675 Alternative be considered any more significant than those for the Phase 1/Phase 2 option? 		substantially lessen the impacts of the Phase 1/Phase 2 project, alternative was analyzed in Chapter 9 in order to provide disclosure to the decision makers and public.
AT-318	9-21, Paragraph 2: "The Existing with Improvements option would not meet many of the project's objectives."	AT-316	This sentence was revised in the recirculated EIR (December 2013) to state the following:
	 Then why is this option even considered? 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? 		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.

AT-317 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.

AT-318 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.

AT-319	9-21, Paragraph 3: "While Phase 1/Phase 2 would have incrementally greater impacts, these impacts	AT-319	As stated in Final EIR Section 9.3, the Existing with Improvements
A1-319	would all be reduced to below a level of significant for the project. Both the Phase 1/Phase 2 and Existing with Improvements would require mitigation to reduce impacts to a less than significant level." 1. So what is this report's determination with regard to the Environmentally Superior Alternative?	A1-319	Alternative would be considered the Environmentally Superior Alternative.

Letter AU Verbinski, Laurette <lverbinski@ucsd.edu> From: Sent: Wednesday, March 06, 2013 6:50 AM DSD EAS To: Subject: Project #212995, UCSD Hillel Center for Jewish Life 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. AU-1 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. Thank you

Letter AV

From: Roger Wiggans < rogwiggans@aol.com> Sent: Monday, March 11, 2013 2:40 PM

To: DSD EAS Cc: Demorest, Erin

Subject: Fwd:Project Name: UCSD HILLEL CENTER FOR JEWISH LIFE, Project No. 212995

My comments are at the bottom of this page. R.Wiggans

----Original Message---From: Demorest, Erin < EDemorest@sandiego.gov> To: rogwiggans <<u>rogwiggans@aol.com</u>> Sent: Mon, Mar 11, 2013 10:19 am Subject: RE: hillel comment

The comments on the Hillel Draft 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 DSDEAS@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 202 C Street, MS 10A San Diego, CA 92101 edemorest@sandiego.gov P: (619) 236-6611 F: (619) 236-6999 www.sandiego.gov/cd1

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

To: Demorest, Erin Subject: FW hillel comment

From: Roger Wiggans [malito roowiggans@acl.com]
Sent: Saturday, March 09, 2013 5:56 PM
To: Lightner, Councilmember Shern; sherri@lightner.net
Subject: hillel 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:

AV-1 Foot traffic between the campus and both of the new structures (Venter building and Hillel) 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 Venter 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 Villiage 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 Wiggans 5877 Soledad Mtn Rd 858-525-2527 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.

Letter AW

STATE OF CALIFORNIA

Edmund G. Brown, Jr.Governor

NATIVE AMERICAN HERITAGE COMMISSION
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3715
Fax (916) 373-3715
Fax (916) 373-3471
Web Sile www.rafnc.ca.gov/
De_nahe@pacbell.net
e-mail: de_nahe@pacbell.inet



December 10,, 2013

Ms. Elizabeth Shearer- Nguyen, Environmental Planner

City of San Diego Department of Development Services

1222 First Avenue, MS-501 San Diego, CA 92101

AW-1

RE: SCH#2010101030; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "Hillel Center for Jewish Life Project; located in the La Jolla Community; City of San Diego; San Diego County, California

Dear Ms. Shearer-Nguyen:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine: If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

AW-2

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure pursuant to California Government Code Section 6254.10.

AW-1 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.

AW-2 See response to comment AW-1.

- AW-3

 A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.
- AW-4 California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People... with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies" and Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.
- AW-5

 Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).
- AW-6

 Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead then, lead agencies include in their mitigation plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.
- AW-7

 Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely

Dave Singleton

Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

- AW-3 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.
- AW-4 The CEQA process has included consultation and inclusion of the Native American tribes relevant to the project site.
- AW-5 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.
- AW-6 See responses to comments AW-1 and AW-5.
- AW-7 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.

Native American Contacts San Diego County California December 10, 2013

Barona Group of the Capitan Grande Clifford LaChappa, Chairperson 1095 Barona Road Diegueno

Lakeside CA 92040 sue@barona-nsn.gov (619) 443-6612 619-443-0681

Sycuan Band of the Kumeyaay Nation Daniel Tucker, Chairperson

5459 Sycuan Road

Diegueno/Kumeyaay

El Cajon . CA 92019 ssilva@sycuan-nsn.gov 619 445-2613 619 445-1927 Fax

La Posta Band of Mission Indians Gwendolyn Parada, Chairperson

PO Box 1120 Boulevard , CA 91905 qparada@lapostacasino.

(619) 478-2113 619-478-2125

Viejas Band of Kumeyaay Indians Anthony R. Pico, Chairperson

PO Box 908 Diegueno/Kumeyaay

. CA 91903 Alpine jhagen@viejas-nsn.gov (619) 445-3810 (619) 445-5337 Fax

Manzanita Band of Kumeyaay Nation

Leroy J. Elliott, Chairperson

PO Box 1302

Diegueno/Kumeyaay Boulevard , CA 91905

ljbirdsinger@aol.com (619) 766-4930 (619) 766-4957 Fax

San Pasqual Band of Mission Indians Allen E. Lawson, Chairperson

Diegueno/Kumeyaay

PO Box 365 Diegueno Valley Center: CA 92082 Campo

allenl@sanpasqualband.com (760) 749-3200 (760) 749-3876 Fax

Kumeyaay Cultural Historic Committee

Ron Christman

56 Viejas Grade Road Diegueno/Kumeyaay Alpine , CA 92001

(619) 445-0385

Campo Band of Mission Indians Ralph Goff, Chairperson

36190 Church Road, Suite 1 Diegueno/Kumeyaay . CA 91906

chairgoff@aol.com (619) 478-9046 (619) 478-5818 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 Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list sonly applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010101030. CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Hillel Center for Jewish Life; located in the La Jolia Community. City and Country of San Diego, California.

Native American Contacts San Diego County California December 10, 2013

Jamul Indian Village Raymond Hunter, Chairperson

P.O. Box 612 Diegueno/Kumeyaay Jamul CA 91935

Jamul CA 919 jamulrez@sctdv.net (619) 669-4785 (619) 669-48178 - Fax

Mesa Grande Band of Mission Indians Mark Romero, Chairperson

P.O Box 270

P.O Box 270 Diegueno Santa Ysabel, CA 92070 mesagrandeband@msn.com

(760) 782-3818 (760) 782-9092 Fax

Kwaaymii Laguna Band of Mission Indians Carmen Lucas

P.O. Box 775

P.O. Box 775 Diegueno -Pine Valley CA 91962

(619) 709-4207

Inaja Band of Mission Indians Rebecca Osuna, Chairman

2005 S. Escondido Blvd. Diegueno Escondido CA 92025

(760) 737-7628 (760) 747-8568 Fax Kumeyaay Cultural Repatriation Committee Steve Banegas, Spokesperson

1095 Barona Road Diegueno/Kumeyaay Lakeside CA 92040

Lakeside : CA 92040 sbenegas50@gmail.com (619) 742-5587 (619) 443-0681 FAX

Viejas Band of Kumeyaay Indians ATTN: Julie Hagen, cultural Resources

P.O. Box 908 Diegueno/Kumeyaay

Alpine CA 91903 |hagen@viejas-nsn.gov (619) 445-3810 (619) 445-5337

Ewilaapaayp Tribal Office Will Micklin, Executive Director

4054 Willows Road Diegueno/Kurneyaay
Alpine , CA 91901

wmicklin@leaningrock.net (619) 445-6315 - voice (619) 445-9126 - fax

Ipay Nation of Santa Ysabel Clint Linton, Director of Cultural Resources

P.O. Box 507 Diegueno/Kumeyaay
Santa Ysabel CA 92070

cjlinton73@aol.com (760) 803-5694 cjlinton73@aol.com

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his list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH/2010101039; CEOA Notice of Completion, draft Environmental Impact Report (DEIR) for the Hillel Center for Jewish Life; located in the La Jolla Community; City and Country of San Diego, Celifornia.

Native American Contacts San Diego County California December 10, 2013

Kumeyaay Diegueno Land Conservancy Mr. Kim Bactad, Executive Director 2 Kwaaypaay Court Diegueno/Kumeyaay El Cajon CA 91919 (619) 445-0238 - FAX (619) 659-1008 - Office

kimbactad@gmail.com

Inter-Tribal Cultural Resource Protection Council Frank Brown, Coordinator; Viejas THPO 240 Brown Road Diegueno/Kumeyaay Alpine CA 91901 frbrown@viejas-nsn.gov (619) 884-6437

Kumeyaay Cultural Repatriation Committee
Bernice Paipa, Vice Spokesperson
1095 Barona Road Diegueno/Kumeyaay
Lakeside CA 92040
(619) 478-2113
(KCRC is a Coalituon of 12
Kumeyaay Governments)
bp@lapostatribe.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 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

his list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010101030, CEGA Natice of Completion; draft Environmental Impact Report (DEIR) for the Hillel Center for Jewish Life; located in the Lu Jolla Community; City and Country of San Diego, California.

Letter AX



STATE OF CALIFORNIA GOVERNOR'S OFFICE of PLANNING AND RESEARCH STATE CLEARINGHOUSE AND PLANNING UNIT



DIRECTOR

January 22, 2014

Elizabeth Shearer-Nguyen City of San Diego 1222 First Avenue, MS-501 San Diego, CA 92101

Subject: UCSD Hillel Center for Jewish Life (aka Hillel Student Center of San Diego) SCH#: 2010101030

Dear Elizabeth Shearer-Nguyen:

AX-1

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 continent 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 21104(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. Those 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

ce: Desources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044 (916) 445-0613 FAX (916) 323-3018 www.opt.ca.gov

AX-1 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 SCH# 2010101030 Project Title UCSD Hillel Center for Jewish Life (ska Hillel Student Center of San Diego) Lead Agency San Diego, City of Type EIR Draft EIR Description Note: Recirculated Site Development and Public Right-of-way vacation to allow the applicant to develop the Hillel 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 Name Elizabeth Shearer-Nguyen Agency City of San Diego Phone (619) 446-5369 email Address 1222 First Avenue, MS-501 City San Diego State CA Zip 92101 **Project Location** County San Diego City La Jolla Region Lat/Long 32.869695° N / 117.242048° W Cross Streets Cliffridge Avenue Parcel No. 344-131-0100 Range Township Section Base Proximity to: Highways Airports Railways Waterways Schools Land Use Residential/Single Family Geologic/Selsmic; Noise, Traffic/Circulation; Vegetation; Water Quality; Wildlife; Landuse; Project Issues Archaeologic-Historic; Biological Resources; Other Issues Reviewing Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Office Agencies of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission Date Received 12/06/2013 Start of Review 12/06/2013 End of Review 01/21/2014

Letter AY

RINCON BAND OF LUISEÑO INDIANS

Culture Committee

l W. Tribal Road - Valley Center, California 92082 (700) 297-2622 pr (760) 297-2633 & Fax:1760) 267-2639



December 9, 2013

The City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Subject: Hillel Center for Jewish Life, Project No. 212995 SCH# 2010101030

Dear E. Shearer-Nguyen,

AY-1 This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the Hillel Center for Jewish Life, Project No. 212995 SCH# 2010101030. Rincon is submitting these comments concerning your Project's potential impact on Luiseño cultural resources.

The Rincon Band has concerns for impacts to historic and cultural resources and findings of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. In fact, your project falls within the boundaries of the Kumeyaay Aboriginal Territory, We recommend that you locate a Tribe within the project area to receive direction on how to handle any inadvertent findings according to their traditions and customs. Also, we recommend a Native American Monitor be present during any and all ground disturbances.

AY-2

If you would like information on Tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral. If for some reason you are unable to locate an interested tribe please notify us and we will be happy to assist you in the matter. We also request you update your contact information for Rincon and send any future letters and correspondence to the Rincon Tribal Chairman and the Tribal Historic Preservation Officer in the Cultural Resource Center, 1 W. Tribal Road, Valley Center, CA 92082 (760) 297-

Thank you for this opportunity to protect and preserve our cultural assets.

Sincerely,

Rose Duro Rincon Culture Committee Chairman

meon Culture Committee Chairman

Bo Mazzetti Tribal Chairmin Stephanie Spencer Vice Chairwoman Steve Stallings Council Member Laurie E. Gonzalez Council Member Frank Mazzetti III Council Member AY-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.

AY-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 on the project site.

The City acknowledges the updated contact information.

Letter AZ



P.O Box 908 Alpine, CA 91903 #1 Viejas Grade Road Alpine, CA 91901

> Phone: 6194453810 Fax: 6194455337 viejas.com

January 21, 2014

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

RE: Hillel Center for Jewish Life

Dear E. Shearer-Nguyem,

AZ-1 The Viejas Band of Kurneyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site is has cultural significance or ties to Viejas. We, request to be to have a Native American Cultural Monitor present so that Viejas will be informed of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains. Viejas Cultural Monitors are available if needed. For scheduling, please call Julie Hagen at 619-659-2339 or email at https://doi.org/10.1007/j.needed.nee

Sincerely, VIEJAS BAND OF KUMEYAAY INDIANS

AZ-1 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.

Letter BA



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

La Jolla Community Planning Association Comments on Recirculated dEIR - Hillel Center for Jewish Life Page 1 of 5

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 The LJCPA finds the Recirculated dEIR deficient in the following areas:

- Use of an attendance limit of 50 persons for noise analysis, even though the building has occupancy limit far greater.
- Increased traffic in the area due to projected future building in the Scripps Upper Mesa site next to the Venter Institute.
- 3. Siting of a student center in the Single Family Zone.
- The traffic pattern, turning from LJ Village drive onto LJ Scenic Drive North makes the driveway unsafe.
- 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.
- Loss of 9 spaces of street parking in the campus parking overlay zone in an area already impacted by the UCSD campus.
- 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,"

BA-1 This comment is an introduction to comments that follow. No further response is required.

La Jolla Community Planning Association
Comments on Recirculated dFIR - 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 analysis 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 on comings 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 Venter Institute. At a minimum there will be three future developments in the immediate area the size of the Venter 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.

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.

BA-2 (cont.)

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.

BA-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.

BA-4 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 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 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.

La Jolla Community Planning Association Comments on Recirculated dEIR - Hillel Center for Jewish Life Page 3 of 5

BA-5 Locating a Student Center in the Single Family Zone

The La Jolla Shores Planned District Ordinance allows "Churches, temples or buildings of a permanent nature, used primarily for religious purposes" to be constructed within its single family residential neighborhoods. However, Hillel of San Diego is not a religious institution within the meaning of the La Jolla Shores Planned District Ordinance, Hillel is a university student social organization with a religious/ethnic affiliation. The DRAFT EIR fails to recognize that the many uses proposed for the HILLEL CENTER for JEWISH LIFE facility are not primarily for religious purposes and therefore are not allowed within the Single Family Zone of the La Jolla Shores Planned District.

BA-6 The Hillel project will be Precedent Setting

The issue of a student center in a single-family zone is only cursorily addressed by the Draft EIR. Draft EIR addresses the precedent set by this project as something of a side issue. There are known to be more than 50 such religious student organizations on the UCSD campus. By allowing the Hillel Student Center to be developed in a single-family zoned area and not meet the requirement of "church, temple, and building primarily for religious purposes," opens all single-family zoned areas to similar development. The comments in the Draft EIR that the area is already built up ignore future purchases and development of single-family homes for similar student organization centers as was done by Hillel at 8976 Cliffridge Avenue.

The DRAFT EIR fails to recognize that, if approved, the Hillel Center for Student Life will set a precedent for other student social organizations with religious/ethnic affiliations to be allowed to be constructed in the Single Family Zone of the La Jolla Shores Planned District, contrary to the provisions of the La Jolla Shores Planned District Ordinance. This precedent is enormous and has enormous implications none of which are addressed by the DEIR.

At a minimum, the DRAFT EIR should be revised to analyze the cumulative impact on single family residential neighborhoods from future purchases of residential properties and development/conversion into student center /religious facilities similar to Hillel.

BA-7 Onsite Parking Space is Inadequate

The number of on-site parking spaces proposed is based on projections of the number of students attending the facility at any time as provided by the applicant. Based on the applicant's projections, only 30 parking spaces are provided for both students and staff. Based on the size of the facility and the total amount of assembly space, the center could accommodate upwards of 200 students at any one time, and based on San Diego Municipal Code parking requirements for all of the assembly spaces, the number of required parking spaces significantly exceeds the number of spaces provided. The DRAFT EIR fails to analyze the environmental impact on the residential neighborhood when the number of automobiles arriving at the site cannot be accommodated on site and overflow into the adjacent residential neighborhood.

BA-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.

BA-6 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 offcampus 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

BA-6

BA-6 (cont.)

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.

BA-7 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.

BA-7 (cont.)

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.

La Jolla Community Planning Association Comments on Recirculated dEIR - Hillel Center for Jewish Life Page 4 of 5

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 DRAFTEIR 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 assemble 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.

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.

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Comments on Recognitive dEIR - Hilled Center for Jewish Life	
Date Saff	
rage 5 of 5	
ATTACHMENT "B"	
ATTACHMENT D	
LJCPA March 2013 Comments	

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 Com. 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-
- 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.

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Motion

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 Com. Members: LJCPA 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:

- <u>1.</u> I. 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
 - 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 10 ATD, Hillel currently yields 200 ADT (based on data of current use, not proposed larger facility). That is 20 times the amount of traffic from a house. The projected ADT seems unrealistically low, and does not

La Jolla Community Planning Association Page 2 of 22 Ad Hoc Committee Minutes

account for increased use if 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 (to 34 ft). Corners will be non-standard and the cornering radius will be non-standard. Drivers will not expect this, how will safety be affected?

The Venter Institute (45.000 sq ft. 140 parking spaces) and three other planned projects across Torrey Pines Rd are not considered. Venter alone should add significant traffic, but not counted in the DEIR. Venter 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 Dunaway to do a U-turn on Torrey Pines Rd., or 2) drive through the neighborhood on Cliffridge and La Jolla Sceme Drive to avoid one set of lights at Torrey Pines Rd and La Jolla Village Drive. This impact is not discussed.

Traffic in Summary. The DEIR is required to consider major future and cumulative impacts.

4. 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. Lot ties 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 60 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.

5. Noise. 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 car doors, talking, traffic. The DEIR did not evaluate the maximum use of the facility complex, or at the maximum capacity, or the out of doors uses. There was an acknowledgement that noise will exceed that from the Cliffridge house.

Noise Ordinance allows Single Family Residential: 50 dB(A) 7 AM to 7 PM

45 dB(A) 7 FM to 10 PM 40 dB(A) 10 PM to 7 AM

Places of worship are allowed exterior noise of:

65 CNEL

Higher educational institutions are allowed: 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.

La Jolla Community Planning Association

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6. III. Visual Effects and Neighborhood Character DEIR Section 4.12 Applicable Design Regulations Section 4.12.1.3

Excerpts from Mr. Merten's Letter below.

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

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 arch.

7. 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.

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.

(Ad Hoc Com. summary: The houses are generously set back 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 LJSPDO.

8. The LJSPDO states: General Design Regulations

To conserve important design character in La Jolla Shores, some <u>uniformity</u> of detail, <u>scale</u>, <u>proportion</u>, texture, materials, color and building <u>form</u> 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 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. See Mr. Merten's Letter for complete content.

More Visual Effects and Neighborhood Character

9. 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

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- <u>10.</u> 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 sum.
- 11. Traffic, ADT. Hillel currently yields 200 ADT, a single family house yields 10 ADT.
- <u>12.</u> 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.
- <u>13</u>. No Enforcement. There is no mechanism to maintain or enforce the level of activity or number of people at events.
- <u>14.</u> 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.

- <u>15.</u> A. Goal of walking distance. UCSD is $\sim 2 \frac{1}{2}$ miles E to W, and $\sim 1 \frac{1}{2}$ 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.
- <u>16.</u> 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 Stude	ent Center?	DEIR pg 3-15	Table 3-1,
Student Center	3,682 sq ft	57%	
Library/Chapel	984 sq ft	15%	
Leadership Building	1,813 sq ft	28%	
Gross Building Area	6,479 sq ft	100%	

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.
- <u>20. V. Parking.</u> 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.

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LDC requires Religious Inst. Plans in the DEIR show, there are no fixed seats or 1,000 sq ft assembly area (1,600 sq ft or 3,000 sq ft) Required NA (1,600 sq ft or 3,000 sq ft)

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 46% (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

- <u>21.</u> 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 LJ Scenic Drive North. Paraphrased Summary from Dr. Starr's Letter.
- 22. Omission 1, Right of Way Vacation: (The four Municipal Code findings for a ROW Vacation can't be meet.)
- 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 cal-de-sac is vacated and the curb painted red for the standard sight distance. DEIR pg 3-45.
- <u>25.</u> Other Uses will be Impacted. The cal-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. Code 131.0401). Continued use of an office and Phase I should not be permitted. Phase I would require a deviation for the additional 6 parking spaces and reduction in landscape/increase in hardscape. 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. Ross Starr

Ms. Julie Hamilton.

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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.	
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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 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.
- 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.
- 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

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southeastern building proposes a <u>south building facade 80' long</u> setback 10' to 11' from the street property line, and the subject western building proposes a <u>south building facade 70' long</u> setback 10' to 11' from the street property line. Taken together these two structure 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 in general conformity with those in the vicinity; and the <u>form</u> and <u>relationship</u> 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. <u>Therefore, the proposed project is not in accordance with the General Design Principal section or the Building and structure setback regulations of the LJSPDO.</u>

Finally, the LJSPDO 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 <u>used in evaluating the appropriateness of any development</u> 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.

<u>29.</u> 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:

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

and

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

<u>32</u>. • Strive for <u>consistency within groups through use of recurring shapes</u> 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.

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Merten

Ross M. Starr, Ph.D. 8675 Cliffridge Ave. La Jolla, CA 92037 January 30, 2013

Ms. E. Shearer-Nguyen Environmental Planner 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. 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 simply 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 grudging (primarily symbolic) 15% of the building (library/chapel) may be for religious purposes.

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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 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 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 occupant load of approximately 290 persons (see http://www.scribd.com/doc/13284922/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 HCJL in the City's Manicipal 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 142-05F. 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 misconstruction, that the HCIL 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 consulatively." 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 Connection of San Diego (see http://longa.ucsd.edustudentorgregistration/RdOnlyList.aspx?frmFocus=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

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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.

Translating these remarks: the precedent is indeed set. Approval of the HCJL 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 HCJL 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. 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 action 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 (Cliffridge 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 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.

Pages 71 through 77 of (La Jolla) UCSD Hillel Center for Jewish Life / Project No. 212995 / Draft EIR / App-A-NOP Comment Letters document decades of City land use planning

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--- 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 hardscape street pavement of the 8900 block of La Jolla Sceme 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 (Cliffridge 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 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.
- <u>39</u>. Omission 3, Violation of the La Jolla Shores Planned District Ordinance: The recirculated DEIR does not recognize that the proposed development violates the LJSPDO. The Ordinance is clear; university facilities do not belong in the single family residential area.
- $\underline{40}$. 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 Gilman 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 IICJL. 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 HCJL, 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

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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.

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TO: LA JOLLA COMMUNITY PLANNING ASSOCIATION

AD HOC COMMITTEE - HILLEL DER

FROM: JULIE HAMILTON

SUBJECT: RESPONSE TO DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE

UCSD HILLEL 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 right-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 size 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 one 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 in the 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 right of way in the project description.

45. S.1.2 - Project Objectives artificially 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 fewish students attend classes and live along the southern edge of UCSD? Including this limitation 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 finds the only significant impacts are noise (impact of noise from La Jolla Village Dr. on the facility), biological resources (nesting rapiors), and paleontologial 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 these impacts.

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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 returns the use of 8976 Cliffridge for the Student Center. This alternative actually results in a larger student center than the proposed project. It may reduce impacts on commannly 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.

46. The "Site 675" 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 DBIR 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 8976 Cliffridge and .8 acres for Site 673 - is that the size of the site before or after the vacation?

51. 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.

52. The project description for the Existing with Improvements Option varies between the notice of availability (religious programs), project synopsis (administrative offices, one-onone counseling, and meetings with students, p.S-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.

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

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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.

54. 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 Cliffridge 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

55. 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 Hillel's efforts to purchase the land for the sole purpose of construction of the student center, in 2000. At that time Site 673 was designated for open space, the Cliffridge 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

- 56. 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.
- 57. 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.
- 58. 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 Cliffridge Property he abandoned by Hillel 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.

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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 is 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 10:00 pm. No other development in the immediate vicinity presents a 100 foot 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 thresholds 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 multify 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 effected 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.

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parking Jot. <u>65</u>. 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.

66. 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.

67. 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.

68. 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.

69. 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.

70. 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.

71. 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 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 spaces per every 1,000 square feet. Assuming less than ½ of each building will be used for assembly area during significant events—the project provides at least 1,600 square feet of

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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 vacation of right-of-way and fails to acknowledge the vacation would reduce the existing street width by two feet measured curb 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 vicanity 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 Sceme Way is at a significantly lower elevation; this creates an improper baseline against which to compare the project. Similarly, the existing conditions fails 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 sheer 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 well setback 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 bulk of the adjacent buildings and does

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not promote harmony in the visual relationships and transitions between new and older buildings. Therefore, the student center will have a significant visual impact.

79. 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

80. 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 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

81. 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

82. 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 the Hillel students only live and attend classes along in the

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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. La Jolla Community Planning Association Page 22 of 22 Hamilton

Letter BB

1714 Kearsarge Road La Jolla CA 92037 3828

08 February 2014

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

> Subject: Hillel Center for Jewish Life, Re-circulated, Revised to update the Traffic and Cumulative Impacts Draft EIR, Project No. 212995 / SCH No. 2010101030

Greetings:

- BB-1

 Although supposedly revised to update the traffic impacts, the DEIR version circulated 06
 December 2013 ignores comment in my letter dated 28 February 2013. I pointed out a problem
 with the design at the southeast corner of the intersection of Torrey Pines Road, La Jolla Village
 Drive and North Torrey Pines Road. The present situation with conflict between bicycles and
 other vehicle traffic is ignored in the Draft Environmental Impact Report and the design of
 proposed development appears to me to create a worse situation.
- BB-2 The plans in the DEIR (shown in diagrams but not discussed) have a mixed pedestrian and bike path leading right to the southeast corner of the intersection with no indication where a cyclist will be directed or how she or he will be protected crossing the intersection or controlled from becoming a hazard to other traffic in the process. It is identified as a bikeway and "New Bicycle and Pedestrian Path". Mixing cycles and pedestrians is not good practice. Directing both mounted cyclists and pedestrians to a common curb cut/handicap ramp at the intersection will create an unsafe situation.

Not only is there no discussion of the bicycle and other vehicle flow in the intersection, the DEIR and its Traffic Impact Analysis appear to take no account of the plans prepared last year by UCSD to modify that intersection to alter the pedestrian and bicycle movements (Bicycle and Pedestrian Master Planning Study, "Crossing at Torrey Pines Road and La Jolla Village Drive", pg.104). I understand that the results of that study were further amplified in the City of San Diego Bicycle Master Plan.

I maintain that the project design for the Hillel Center for Jewish Life, the Draft Environmental Impact Report and the DEIR's Traffic Impact Analysis are superficial and inadequate with regard to bicycle, pedestrian and motor vehicle traffic impacts.

Yours sincerely

Daniel T. Allen

858 245 1586

danallen@alum.mit.edu

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.

BC-1

Letter BC

Jessica F. Attiyeh 8961 Nottingham Place La Jolla, CA 92037

February 6, 2014

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

Subject: Hillel Center for Jewish Life (previously Hillel of San Diego Student Center II,) Project No. 212995, second recirculated DEIR.

Dear Ms. Shearer-Nguyen,

I am responding to the most recent (the second) RDEIR (Recirculated Draft EIR) submitted regarding the now-entitled Hillel Center for Jewish Life (HCJL). As the years have gone by, and each of several revised EIRs have required much time and study of the texts, photos and charts in order to present comments in response, I hope that I am still meeting your needs for an appropriate format, and I thank you for your patience in giving it your attention.

Following are my comments:

- **The RDEIR was not made available online with red-lining or underlining or in any other way to clarify which words or phrases or whole paragraphs might have been revised or added in this revised EIR. This made it very difficult to follow or to discern with any certainty what appropriate comments should be made in response. This was a departure from earlier versions and placed a burden on any respondents who did not wish to spend a substantial sum to print a hard copy of the long document, especially as respondents are advised by the RDEIR to "review the entire document to fully understand the project and its environmental consequences." One hopes this was simply an oversight and not done with the intention to confuse or to discourage readers from making cogent comments.
- BC-2 **The RDEIR is misleading in its presentation of the project's location and setting, in two instances. In the first instance, the project site is said to be "low density residential." While this may be wording in the La Jolla Community Plan which was altered and presented as a fait accompli several years ago with this and other parcel designation errors, the site is actually within a neighborhood zoned as "single-family residential." That is a significant difference.
- **In the second instance, the RDEIR states that 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...." Some drawings of the immediate area are drawn from an angle that underplays the breadth of the 8-lane roadway and therefore the distance between the project site and the UCSD campus. The impression given is that the site is equally close and would equally impact and/or be impacted by each of these

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.

BC-2 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.

BC-3 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.

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uses. In fact, the major 8-lane roadway that is La Jolla Village Drive is what separates the site from the UCSD campus and all buildings within the campus. In stark contrast there is a narrow 34-foot street between the proposed project site and private single-family homes to its west. Another large map of the area shows the mixed-use area approximately 2 miles away that is bounded by La Jolla Village Drive and La Jolla Villa Road, where restaurants, a gas-station and shopping centers are located. That they are shown in the same map as the project site is also misleading, as it suggests to those who do not know the area from personal observation that the Hillel Center for Jewish Life would be just one of many large and populated structures in close proximity.

BC-4

The RDEIR neglects to point out that the HCJL would stand out as three structures effectively making one compound and with a combined footprint almost as broad as 3 of the single-family homes across the narrow street and, because it is on an elevated island, significantly higher than the single-family homes across the four lane street (La Jolla Scenic Way) to the east.

In short, the RDEIR fails to candidly portray the physical context and visual context of the proposed HCJL project.

- BC-5 **The RDEIR stipulates exterior lighting that is chosen to minimize the impact of light from the project onto facing homes. However, site elevations show clearly that both the east and west sides of the project structures place large and high glass windows that face the homes to the east and west. The spill of lights from these windows at night events will add to the impact of the peripheral lighting. This is not addressed by the RDEIR.
- ** The RDEIR does not indicate that Hillel is not the owner of record of the single-family house at 8976 Cliffridge Avenue. In fact, the signed owner is a Mr.Marshall from out of the area who has never lived there, and the "silent" (my term) owner is the Potiker Foundation. Yet the RDEIR presumes and posits that if a permit is not granted for the Phase 1/Phase 2 triangular parcel, it will make that house the location for permanent administrative offices, group meeting space, counseling and other activities making the house a de facto HCJL. The La Jolla Planned District Ordinance (LJPDO) prohibits such uses of a single-family residential house in the single-family residential zone in which it is situated. The validity of the entire proposed project rests on the assumption that the house is Hillel's to bargain with.
- ** The RDEIR neglects to point out that 8976 Cliffridge Avenue is still zoned as a single-family residence, and that Hillel was given waivers for several years, although by the rules of the LJPDO, such waivers are allowed for only "one year in certain circumstances." This is already a breach of the Ordinance and shows disregard for the rules that apply to all neighborhood homes in this zone.
- BC-8 ** If a permit for the proposed HCJL were to be approved, the RDEIR states that the Cliffridge house would "revert to private home status" but it fails to be explicit about what that would mean in actual fact. It does not guarantee that private home status would mean putting the house on the open market; it does not guarantee that it would not then be used as a home for HCJL staff, or that it would not then be maintained as a de facto part of the overall institution, and/or used as a corollary facility for the Center.
- BC-9 **The RDEIR proposes a Right of Way (ROW) permit to allow in the first phase a street vacation for filling in the cul de sac (with changed curb cut and driveway access) currently alongside the

BC-4 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.

BC-5 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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BC-5 (cont.)

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.

BC-6 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.

Pursuant to CEQA, the decision makers could choose to approve the Existing with Improvements Alternative in lieu of the proposed project.

Either the Phase1/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."

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.

BC-7	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.
BC-8	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.).
BC-9	lease, etc.). 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.

Cliffridge house, and removing the current garage to make space for the 6 parking spaces deemed necessary for the office use. It further proposes a two-foot street vacation along La Jolla Scenic Drive North (LJSDN). It fails to discuss whether or not the cul de sac and its related changes would be returned to its original state (including rebuilding the garage) if and when the house is returned to private home status and is owned by a private citizen who is neither affiliated with nor wishes his property to be physically connected to the Phase 2 Project. Further, it does not discuss who would be responsible for the costs of such restoration – Hillel, the City, or the new owner?

- **The ROW proposed for a two-foot street vacation along La Jolla Scenic Drive North, would exacerbate an existing hazardous condition for residents, visitors, and students with or without a stop-sign at the corner of LJSDN and Cliffridge Avenue. When turning either left onto Cliffridge from LJSDN or right from Cliffridge onto LJSDN, drivers must often pull out blindly around the curves before obtaining a clear line of sight, especially when cars are parked on both sides of LJSDN and Cliffridge which is often the case and which effectively obscures and narrows the street even further. Students, UCSD theater-goers, visitors to neighborhood homes, and service vehicles all park along both sides of LJSDN at all times of day and into the evening hours. It is often impossible to see sufficiently far ahead in negotiating these turns. When drivers are distracted, in a hurry, and/or surprised to find another vehicle heading toward them on the narrowed street the potential for collision is great. Residents are well aware of these hazards from personal experience.
- BC-11 **Although the RDEIR claims that the project setbacks of 10 feet are the same as those for neighborhood homes, that is not true for homes in the neighborhood west of the project site, which are just 34-36 feet across LJSDN from the site, and in which the project is actually situated. Homes in this entire neighborhood have a real curb to garage of 10 feet, but setbacks from curb to the front wall of the houses are an additional 20 feet, with a total setback of 30 feet. As a result, the project setbacks would not be consistent with them.
- BC-12 **The RDEIR does not quantify or show explicitly in any way what it means by "primarily for religious purposes." It would seem that, to Hillel, the mere fact that having permanent buildings, a frequent or even daily activity or two with religious references proves that the HCJL lives up to the intended meaning of the LJ PD Ordinance. The ordinance was written to include facilities that provide congregations a place for assembly and services, meaning churches, synagogues, or temples, not simply organizations with religious affiliation. Nationwide Hillel student centers are candid in their description of their focus and their programs, heavily (read primarily) weighted with social and community-building activities. To justify the term "primarily" the RDEIR should be able to provide explicit evidence that daily/weekly time spent on prayers, Torah studies, and religious ceremonies clearly outweighs time spent on their Student Center oriented activities such as counseling and drop-in time (e.g., personal issues and cultural identification, academic support and study time, socialization (e.g., dances, parties, cooking/baking), and community-building (e.g., community service, supporting the State of Israel).

Neither the student membership nor the facility itself is called a "congregation" in the religious meaning of the word. It may be a laudable "community" but not a religious congregation.

BC-10 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.

- BC-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.
- BC-12 See response to comment BC-6.

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BC-13 **Even just within the first 20 pages of this recently revised DEIR the words "student center" have been crossed out and replaced by "for religious use" or "primarily religious use" 18 times. As it became more clear over the years that the organization had to better convey a "primarily religious" orientation in order to justify a permit within a single-family-only neighborhood, Hillel adopted several changes of name over time. When first proposed it was simply a "Student Center." In 2004 it was "Hillel of San Diego." In the 2008 DEIR it was still "Hillel of San Diego." Currently it is "The Hillel Center for Jewish Life." However, the social and activist functions continue to be predominant – i.e., primary. The Hillel of San Diego at UCSD website clearly states in its Mission Statement the following: "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 lewish Community."

It goes on to specifically cite;

"-serving the needs of individual Jewish students; - creatively engaging and empowering Jewish students through personal interactions and compelling programs; - nurturing intellectual and spiritual growth; - 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." There is no mention of religious services.

Neither the Hillel of San Diego at UCSD Mission Statement nor the RDEIR itself cite religious rituals and/or religious services as the "primary" activities, either in terms of time spent or of importance in the overall program. Despite the many references in the RDEIR to the word "religious" and despite the new inclusion in the plans of a section of the library building's space called a Chapel, neither the RDEIR nor the Mission Statement support the assertion the HCJL's programs or allocation of time spent are "primarily religious" in nature.

Considering all the above, and the fact that the RDEIR specifically states that Shabbat and large religious services are in fact to be held elsewhere on campus, as they have been for all the past years, it is clear that what by any other name is primarily a well-conceived and laudable student center, the HCJL is not a permitted use in the single-family residential zone.

- BC-14 **The RDEIR does not reference the description of Hillel's own architect, Mark Steele, who publicly stated in October, 2010, that "The facility really is primarily simply a student center, study center, some office space, and that it is no longer to be used for any major gatherings whatsoever." Even on Mr. Steele's current professional website, he categorizes the project under the "institutional" heading and not under the "sacred" heading.
- BC-15 **An important issue concerns parking: If, as has been put forward in the RDEIR, the parking standards for places of religious assembly don't apply to the HCJL (as regards seating places per square feet of assembly area), then how can the RDEIR simultaneously claim that the building is used "primarily for religious purposes?" On the other hand, if the Hillel claims that the HCJL is "primarily for religious purposes" then it must comply with the Land Development Code for places of religious assembly. This specifies 1 parking space per 3 seats, or 1 per 60 inches of pew space, or 30 per 1,000 square feet of assembly area. The RDEIR proposal provides only for 27 parking spaces, and therefore does not comply with the 47 required spaces required.

BC-13 The recirculated EIR (December 2013) was revised to clarify the use. See response to comment BC-6.

- BC-14 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.
- BC-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 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.

BC-15 (cont.)

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.

by the almost 7,000 square feet of floor space that could all be configured to be used as assembly area. The outdoor courtyard adds further square footage.

- **The RDEIR specifies multiple showers, ostensibly for bikers to use. However, whether students live on campus or in apartments off campus, they presumably have showers at home. If they regularly bike to or around the campus between classes and to attend other activities, they manage without showers within the course of every academic day. If they take physical education classes or sports activities, PE facilities provide showers. Showers at HCJL would be a nice amenity, but would not be necessary at a student center unless it is projected that students may sleep there on occasions such as studying late into the night or during the holiday of Succot, when according to custom and practice they would sleep and eat in the outdoor grounds, in the Succah. This would involve hours of use beyond what is specified in the RDEIR.
- BC-17 **The RDEIR states that Hillel anticipates only 15-30 students coming on a daily basis, with an occasional outside number of about 50 persons. This would not appear to necessitate a development consisting of 3 structures with combined square footage of over 6,500 square feet. Even in neighborhood homes that average only between 2000 to 3000 square feet, they accommodate full kitchens and 2-4 bathrooms, sufficient for this number of students, for several concurrent small-group meetings, and even for a meeting of 30 or more persons as experienced numerous times within the community. Larger events and Shabbat dinners could both continue to be held on campus in the future as they have been to date.
- BC-18 **The RDEIR does not candidly admit to or address possible future plans for expansion, which would invalidate all the current RDEIR foot and traffic estimates, noise levels, and bulk and scale estimates as written now. Given the estimated approximately 2000 Jewish students at UCSD plus some unspecified number of Jewish faculty, one could anticipate eventual plans for expansion; in fact, at the 2006 City Council meeting. Hillel representatives "committed" to expanding only after a ten year period and that was when its square footage was much larger than what is currently proposed. The RDEIR therefore presents an inadequate measure of impacts on the character and quality of life in the single-family neighborhood Hillel wishes to inhabit.
- BC-19 **The specter of increasing impacts is underscored by the fact that the RDEIR does not specify a legally binding Conditional Use Permit (CUP), which would hold Hillel to any verbal or written proposals made at this time, for either the short or long term. Therefore there are no real limits to hours of use, numbers of UCSD students, usage by non-student/non-UCSD gatherings, or types of usage (i.e., rallies, weddings, outdoor barbeques, etc.,) noise or lighting parking impacts, or any efforts to monitor and/or enforce these and to ensure accountability over the short or long term.
- BC-20

 *The RDEIR's traffic and parking impacts analysis presupposes that 80% of students will walk, bicycle or take a shuttle from UCSD instead of driving to events at HCJL and needing to park off-site, on neighborhood streets in front of homes. It does not take into account the weather events, personal safety, or time pressures that govern students' transportation/mobility choices over the course of the academic year. It does not consider how far students may have to walk to and from classes to access a carpool or shuttle, either coming to Hillel or returning home or to class after an HCJL activity. It does not speak to rainy or foggy days, when riding bicycles might be difficult or dangerous. It does not differentiate between daytime and nighttime

BC-16 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.

BC-17 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.

BC-18 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.

BC-19 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.

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

compliance. It does not take into account that young women students are particularly likely to feel and in fact be at risk walking or biking at night and will therefore choose to drive. It does not reflect the fact that many students are likely to come from class by themselves that are at various and sometimes far-flung points on a large campus nor does it recognize the likelihood that students who commute from off-campus will often choose or need to drive their own cars.

- **Under the section regarding Land Use existing conditions the RDEIR describes the project site in a misleading manner, stating that it is "surrounded by residential and institutional uses." It is indeed within a single-family residential neighborhood, however the nearest institutional structure is the UCSD Mandeville Theater, which is situated across an 8-lane major roadway and some distance beyond that, visible only in part above plantings and at the top of a substantial rise. The recently built Venter Institute is across a 6-lane heavily trafficked roadway. Neither structure sits upon a site zoned as single-family nor is either of them situated within a single-family neighborhood, as does the project site proposed for the HCJL.
- BC-22 **The RDEIR attempts to equate the likelihood of parking and traffic impacts between those at UC Los Angeles, UC Santa Barbara, and the proposed UCSD facility. It fails to acknowledge that both the UCLA and UCSB Hillel centers are in mixed-use neighborhoods and are surrounded by multi-unit apartment houses in which many of their students live and can therefore easily and quickly walk to the Hillel buildings. UCSB's Isla Vista setting famously and predominantly provides housing for the university's students.
- BC-23 **In fact, the RDEIR neglects to point out that the Hillel centers at UC Berkeley, UCLA, UCSB, UC Santa Cruz, UC Irvine and UC Riverside ALL are located where their high usage cannot impose upon their immediate neighbors. Not one is in a single-family residential zone! These Hillel Centers serve their membership very well and also serve their communities very well. Located in mixed-use or special zones, they have no undue constraints on their programming because they exist among other high-use facilities. The Hillel Center for Jewish Life would be the sole outlier, situated within a solely single-family residential zone.

Jessica Falikman Attiyeh

attackment: Locations of other California Hellel Student Conter BC-20 (cont.)

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.

- BC-21 See responses to comments BC-3 and BC-4.
- BC-22 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.
- BC-23 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, Betkeley 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 Roisman Jewish Center at UC Santa Barbara at 781 Embarcadero del Mar: Isla Vista is surrounded by multi-resident buildings. <u>SR-H-20 special zone</u>: 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 Samueli 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 Costo 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.

Letter BD

Richard Attiyeh 8961 Nottingham Place La Jolla, CA 92037

February 6, 2014

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

SUBJECT: UCSD Hillel Center for Jewish Life - Project No. 212995

Dear Ms. Shearer-Nguven:

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:

BD-1 Section S.1.2 Project Objectives

BD-2

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 inspited 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

BD-1 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.

BD-2 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.

other colleges are as follows: Muir College – 1/2 mile; Thurgood Marshall College – 3/4 mile; Eleanor Roosevelt College – 1 mile; Warren College – 1 mile; Sixth College – 1 mile. And the North Campus Housing intended primarily for transfer students is more than 1 and 1/4 miles from Site 653. What this makes clear is that this location for the Hillel student center will not promote "walkability" for Hillel students and it will generate substantial amounts of traffic and on-street parking in this single family neighborhood.

BD-3 Section 4.1 Land Use

- The EIR points out that the La Jolla Shores Planned District allows "churches, temples, or buildings of a permanent nature, used primarily for religious purposes" to be located within a single-family neighborhood. It is clear, however, that although Hillel has a religious affiliation, it would not be used primarily for religious purposes. Most of its proposed activities make clear that it is a student center.
- BD-4 The location of churches, temples, and other buildings for religious use in single family neighborhoods is considered to be appropriate because they serve the needs of the residents of those neighborhoods. The people who would use the Hillel student center are not residents of the La Jolla Highlands neighborhood. Rather, they are students at UCSD and virtually none of them live in this neighborhood. It is clear that this student center, even though it has a religious affiliation, would not serve the community in which it would be located.
- BD-5 As has been pointed out by others, when Site 653 was created, it was intended to be open space. This was supported in 1980 by the La Jolla Shores Association when Hillel's architect, Mark Steele, served as its chairman. Moreover, in 1977, Michael Stepner, a Senior Planner in the City's Planning Department, stated that it was not suitable for development and should be maintained as a landscaped traffic island. It has long been the view of La Jolla Highlands residents that this site should remain open space to serve as a buffer between UCSD and the neighborhood. To build a student center on this site would erode this critical boundary between the University and this community.
- BD-6 The draft EIR uses the Hillel student centers at UCLA and UC Santa Barbara as models for assessing the impact that the proposed UCSD Hillel student center will have on its surrounding community. What the EIR fails to point out, however, is that both of these student centers are located in mixed use neighborhoods. Certainly, if there is a lesson to be learned from these examples, it is that the UCSD Hillel student center should be located in a mixed use neighborhood. Indeed, none of the other University of California Hillel student centers are located in neighborhoods zoned as single-family residential.
- The draft Environmental Impact Report states that the "Existing with Improvements" option is an allowable use of the 8976 Cliffridge Avenue single family house under the La Jolla Shores Planned District zoning. This is incorrect. During City Council

BD-3 See response to comment BD-1.

- BD-4 See response to comment BD-1.
- BD-5 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.
- BD-6 See response to comment BD-2.
- BD-7 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.

BD-8

discussions of the original Hillel student center proposal it was made clear (1) that the use of this house for student center administrative uses was not allowable in a La Jolla Shores single family neighborhood and (2) that the house should be returned to single family use when the final decisions about the Hillel proposal are reached. The fact that the Hillel has a religious affiliation does not provide a basis for using a single family house for administrative purposes.

LETTER

BD-8 Section 4.2 Transportation/Circulation/Parking

- The narrowing of La Jolla Scenic Drive North would create serious problems for traffic on this street. At the present time, the street is already too narrow to comfortably accommodate two-way traffic and parking on both sides of the street. This is particularly problematic because of the acute angles of the entrances to this street from Cliffridge Avenue and from La Jolla Scenic Way. The problem would be compounded by the increase in traffic flow generated by the Hillel student center and by the increasing number of drivers who use Cliffridge Avenue and La Jolla Scenic Drive to avoid the long wait at the corner of Torrey Pines Road and La Jolla Village Drive. The argument that the width of a narrower La Jolla Scenic Drive North would still comply with City regulations ignores the reality that is evident to anyone who, like me and other neighborhood residents, regularly has to use this street.
- BD-9 The location of the entrance to the onsite parking on La Jolla Scenic Way also creates a serious traffic problem. Throughout the day, there are large numbers of cars turning south from La Jolla Village Drive onto La Jolla Scenic Drive North. Having cars entering and exiting the Hillel parking lot would both create congestion and increase accident risk. It was for good reason, when Site 653 was created, that curb cuts along La Jolla Scenic Way were prohibited.
- BD-10 If Hillel's contention that its student center would be used primarily for religious purposes were to be accepted, then Hillel would have to increase its onsite parking to be in compliance with City regulations. For religious facilities that do not have fixed seating, the requirement is that 30 onsite parking spaces be provided for each 1,000 square feet of assembly area. Given that the Hillel student center would have between 2,000 and 3,000 square feet of assembly area, its proposed 27 spaces would be substantially less than the 60 to 90 spaces that would be required by the Municipal Code.
- BD-11 Hillel supporters have argued that the student center would not function as a synagogue and it should not be required to meet the code requirement of 30 onsite parking spaces for each 1,000 square feet of assembly area. But if the number of seats shown in the Building Plan is used as an indication of how many people can be accommodated by the proposed facility, it is clear that the proposed 27 on-site parking spaces fall well short of the number required by City regulations. Figures 3.5 and 3.6 in the EIR show over 120 seats in the Building Plan. If Hillel contends that the proposed student center is a religious facility, then it would require one parking space for each three seats or more than 40 on-site parking spaces.

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.

BD-9 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

3

BD-9 (cont.)

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.

BD-10 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.

BD-10 (cont.)

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.

BD-11 See response to comment BD-10.

BD-12

BD-12 Section 9.0 Project Alternatives

- The draft EIR suggests that Hillel considered alternative locations. The locations
 they have rejected all have the following major advantage: None of them are in a
 single family neighborhood. It is clear from the discussion of this issue in the EIR
 that Hillel has not given serious consideration to a reasonable range of alternatives to
 Site 653.
- BD-13 Possibilities east of the campus would be near plentiful student parking and would be near campus shuttle stops. For this reason, this location would be more convenient than Site 653 for many UCSD students. In many respects the relationships between these sites and the UCSD campus would be similar to the relationships between the UCLA and UCSB Hillel student centers and their respective campuses.
- BD-14 Another alternative is Site 675. Although this site may not be perfect in every respect, it has the advantage of providing a location adjacent to the campus that is convenient for UCSD students. No matter how it may be zoned, Site 657 is not in a single family neighborhood. I believe the environmental issues that would need to be dealt with on Site 657 are not as significant as the draft EIR suggests. This site is in many respects a preferable location than Site 653 and deserves more serious consideration.
- BD-15 Over the years, a number of sites have become available along Villa La Jolla Drive, south of La Jolla Village Drive. To cite just one example, the building that housed the El Torito restaurant recently became available. It is about the same distance from much on-campus housing as Site 653, it has plentiful on-site parking available, and it is in a mixed use neighborhood. Apparently, however, Hillel did not pursue this option. Sadly, it is my understanding that it is no longer available.

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

Sincerely

Richard Attiveh

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.

BD-13 See response to comment BD-12.

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.
BD-15	See responses to comments BD-12.

BE-1

Letter BE

John A. Berol 8521 Avenida de las Ondas La Jolla CA 92037

Tuesday, December 10, 2013

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

SUBJECT: HILLEL CENTER FOR JEWISH LIFE, Project 212995 / SCH 2010101030, SAP 24000958

Ladies and gentlemen:

BE-2

The 12-6-2013 Recirculated Draft Environmental Impact Report (RDEIR) errs in paragraph 6.3 at pages 6-2 and 6-3 where it opines that there would be no harmful precedent.

BE-1

Firstly, the RDEIR states at page 6-2: "...the requested deviations are site-specific and would not set a precedent" This statement is devoid of rational meaning in as much as all requests for deviations are always site specific. By callously making such a meaningless statement in denial of the real legitimate residential neighborhood concerns for precedent, the RDEIR creates an appearance of being biased in favor of project approval.

Secondly, the problem of precedent is exacerbated by the RDEIR's novel interpretation of the Municipal Code. The RDEIR promulgates the new idea that the Code permits any permanent building so long as it is primarily used for religious purposes. This novel (and erroneous) interpretation gives no respect to the words "church" and "temple" where the Code permits: "churches, temples, or buildings of a permanent nature, used primarily for religious purposes," These words "church" and "temple" would be made irrelevant under the RDEIR interpretation. Why is the RDEIR interpreting the Code in a manner which removes words which the City Counsel put there? In the many decades since this clause was written as part of the La Jolla Shores Planned District Ordinance (LJS-PDO) section of the Municipal Code, the clause has only been used to permit Houses of Worship (such as churches and temples) and has never been expanded, as RDEIR proposes, to permit any permanent building so long as it is primarily used for religious purposes. Precedent since 1974 and reasonable interpretation counsel that this clause permits Houses of Worship and nothing more. The RDEIR seeks to use the less than perfect drafting skills of the volunteer framers of the US-PDO so as to create a loophole to permit an institutional facility for UCSD religious students. The RDEIR then irrationally and cavalierly claims no precedent effects from this expansion of what is permitted. Nonsense. The applicant itself has already converted one single-family home for such use. What would keep more single-family homes from being converted in the same manner under such an expanded Interpretation? Nothing! Moreover the primary project envisioned is a group of institutional

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

Section 6.3 of the recirculated EIR was updated (December 2013) to

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.

BE-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

E. Shearer- Nguyen, December 9, 2013 HILLEL CENTER FOR JEWISH LIFE, Project 212995 / SCH 2010101030, SAP 24000958 Page 2 BE-2 (cont.)

buildings having no affinity (visual or daily life sound rhythms) with the surrounding residential houses. With this new expanded interpretation of the Code as precedent, any corporation could claim a right to build a corporate retreat in the LIS-PDO residential zone of La Jolla Shores (which extends all the way to the beach and up the hill to Mount Soledad) so long as the persons attending the retreat would be going "primarily for religious purposes". How would the City determine and regulate the religious activity of persons at such religious retreats? The impracticality and unconstitutionality of such government intrusion upon private life shows why the RDEIR's novel interpretation of the Code is absurd. The historical meaning of the Code should be upheld. There is nationwide precedent for knowing which buildings are Houses of Worship whether they be church, temple, synagogue, mosque, or some other name. Experience and observation show that admission to Houses of Worship is based upon desire to worship in the manner of a particular religion and is not based upon being a student at UCSD. Because the owner of the proposed buildings would prohibit worship therein by those without proper university affiliation, the project is not a House of Worship in the context of residential zoning which permits churches, temples, synagogues, mosques, etc. Such a university based religious institution needs an appropriate non-residential zone. Note for example that while the Northwest YMCA in La Jolla Shores expresses a religious purpose in its mission statement ("helping all people realize their fullest potential as children of God through the development of the spirit, mind and body" http://www.lajolla.ymca.org/general-info.html) it is located in a non-residential zone (Municipal Code §1510.0312). While the YMCA is surrounded by a residential zone, the persons who bought next to the YMCA zone had a choice when doing so.

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.

CONCLUSION:

BE-3

The RDEIR quotes the House of Worship clause (Municipal Code Section 1510.0303(e) [Single-Family Zone – Permitted Uses]) at pages S-2, 2-13, 3-55, 4.1-6, 4.1-13, 6-2, and 7-6 but instead of a serious analysis of the text, it merely accepts applicant's interpretation so as to achieve approval of the project. By proclaiming no precedent effect, the RDEIR demonstrates deliberate blindness to both past and future. The problem with applicant's proposal is its disregard for homeowner expectations for residential life in the residential zone. Persons buying homes in La Jolla Shores choose to accept UCSD on its campus and Houses of Worship next door; but in relying upon the residential zone, no one could have reasonably expected institutional UCSD student facilities to be built next door inside the residential zone.

John A. Berol

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BE-3 See responses to comments BE-1 and BE-2.

Letter BF

Maarten and Janet Chrispeels 8703 Glenwick lane La Jolla, CA 92037

La Jolla, CA Februari 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 re-circulated 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 Glenwick 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-2

 It is truly unfortunate that for 15 years now the Hillel foundation has battled to propose a change 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.
- 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 theatres is limited on the many evenings that there are performances with a little spillover 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

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.

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.

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 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 name was changed to clarify the project as permanent facility used primarily for religious purposes.

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.

BF-4	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.	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	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. Sincérely yours,	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.
	Maarten and Janet Chrispeels		

	Letter BG	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.
	From: Jack Douglas [jddouglas@ucsd.edu] Sent: Tuesday, February 11, 2014 10:43 PM To: DSD EAS Subject: Project # 212995	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
	Dear Ms. Shearer-Nguyen:		Local Street in the La Jolla Community Plan. Per the City's Street
BG-1	I oppose the building of the Hillel Student Center [UCSD Hillel Center for Jewish Life] on site 653.		Design Manual, Residential Local Streets are typically to provide a curb-to-curb width of at least 32 feet (with on-street parallel parking).
	The site is too small for the project. Because the site is inadequate for the proposed purpose, other bad decisions have followed, such as the request for a street vacation.		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
BG-2 BG-3	This street is heavily used and making it more narrow would make it more dangerous for those who use it. Removing parking places [a part of the street vacation] is a significant loss in this neighborhood adjacent to UCSD.		36 feet to 34 feet is considered adequate for the street classification. The reconfiguration of La Jolla Scenic Drive North would be
BG-4	Building a student center here - and even the continued use of the Cliffridge Avenue house - sets a bad precedent for the neighborhood. Other organizations at UCSD will see this residential neighborhood as a possible site for their activities.		designed to City standards. As such, the Phase 1/Phase 2 project would result in a less than significant impact.
	Reverly Douglas	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.
	1	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

BG-4 (cont.) 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 offcampus 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.

Letter BH

Patricia Granger 8854 Robin Hood Lane La Jolla CA 92037 858 450-9441 patgranger@aol.com

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

February 10, 2014

Project Name: Hillel Center for Jewish Life Project No. 212995

Re-Circulated D EIR Due February 11, 2014

BH-1 P. 7 Site 675 Alternative

The intention of this alternative is to locate the proposed Hillel facilities on an alternate site:
—Site 675—the only, a vacant and City available non-UCSD-owned site in La Jolla 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-owned land.

Response:

Has Hillel and the city approached UCSD to discuss a way of trading City owned site 675 for another similarly sized parcel close by, say on the corner of Gilman Drive and Scholars Drive or on the edge of campus? Or could UCSD he helpful in allowing for a shared access road to site 675?

Please comment.

3.2.2 UCSD Hillel Center Purpose and Activities Overview

BH-1 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 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,"

UCSD Hillel Center Purpose and Activities.

"Hillel would pursue its mission by constructing a permanent space to facilitate the religious, spiritual and intellectual growth of Jewish students at UCSD."

BH-2 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.

Response

UCSD is in the University Community Planning District

Any group religious or not that is connected to UCSD should be located in the University City Community under the University Community Planning Group. For example the Neumann Center, located on East Gate Mall.

The La Jolla Highlands neighborhood comes under the La Jolla Community Planning Group and the La Jolla Shores P.D.O.

Building a UCSD Hillel Center for religious purposes in the La Jolla Highlands neighborhood is not for the benefit of people in that community. The benefit is for the Jewish students at UCSD and therefore should be located in the University City planning area under the University Community Planning Group. See the Neumann Center located on East Gate Mall. Land in this area was set aside for the development of University related religious groups.

It is unfortunate that Hillel did not avail them selves of the Horizon Christian Fellowship 2.6-acre site that was available for sale or lease during the period Hillel was trying to lease or buy Site 653.

The information about this site was shown to the City Council on many occasions but ignored by the City and by Hillel.

Please Comment.

P 3-16

BH-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.

BH-3 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 the permanent officeuse by Hillel to provide religious services and programs-including meetings, one-on-one counseling, and administrative use officesfor Jewish students attending UCSD.

P3-51

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 office use forby Hillel to provide religious services and programs to students.

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

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.

Question: explain clearly:

Does this now mean that any single family home can be converted for office space with religious programs and also provide on site parking for six standard parking spaces? Could this set a standard for any religious group on or off UCSD campus to locate on Cliffridge Avenue or neighboring streets?

Could any single family home be converted for religious use and meet the same requirements as a Church or a Temple under the municipal code?

BH-4

P 3-16 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 the permanent officeuse by Hillel to provide religious services and programs-including meetings, one-on-one counseling, and administrative use officesfor Jewish students attending UCSD.

BH-3

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 offcampus 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.

BH-4

With respect to precedent setting, see response to comment BH-3.

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.

TABLE 3-2 PHASE 1/PHASE 2 PARKING AREA SUMMARY

Proposed Parking Spaces

Temporary Parking (Phase 1)

- 5 Standard parking spaces
- 1 van accessible space
- 2 motorcycle spaces
- 4 bicycle spaces

Response:

Wouldn't the plan to add SIX parking spaces to the rear of Hillel's administrative office / religious office at 8976 Cliffridge Avenue set and enormous precedence in the La Jolla Highlands single family residential neighborhood?

Wouldn't adding SIX parking spaces next to a single-family home Cliffridge be intolerable to their neighbor at 8966 Cliffridge Avenue?

Wouldn't the noise and pollution from six vehicles only yards from family's living and sleeping space be considered detrimental to the health, safety and welfare of the family living there?

Please comment.

BH-5 PARKING FOR COUTYARD AND SURFACE PARKING PLAN P 3.8 3-22

> TABLE 3-2 PHASE 1/PHASE 2 PARKING AREA SUMMARY

> > Permanent Parking (Phase 2)

- 25 Standard spaces
- 1 Accessible space
- 1 Van accessible space 2 Motorcycle spaces
- 4 Bicycle spaces

Others will comment on he number of parking spaces needed for a permanent facility of this size.

I see no mention of the access to the parking lot. If as previously shown the parking entrance is from La Jolla Scenic Way. I must remind you that since 1977 (37 years ago) the City Planners decided that it was too dangerous to have a driveway access from La Jolla Village Drive or La Jolla Scenic Way. Consider how much the traffic has increased during that time. To still plan to have an entrance from La Jolla Scenic Way is highly dangerous. There has been no regard for

BH-5 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-tosouthbound 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 vielding 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.

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 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, L.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.

BH-6

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/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.

The Street Vacation and cull-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 cull-de-Sac are in daily use.

A public right-of-way may be vacated only if the decision maker makes the following findings:

- (a) There is no present or prospective public use for the public right-ofway, 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 action through improved use of the land made available by the vacation;

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.

- (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. \$125.0941

The Cull 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 were 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.

BH-7 8.5 Parks and Recreation

As a religious facility, neither the Phase1/Phase2 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 posted, 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.

could only discuss land use not 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.

Please comment.

P 2-11

BH-8 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, <u>open space</u>, and <u>safety)</u>, but permits flexibility and the inclusion of optional elements to best meet the needs of a particular city.

The City's General Plan includes 10 elements: Land Use and Community Planning; Mobility; Urban Design; Economic Prosperity; Public Facilities, Services, <u>and Safety:</u> Recreation; Conservation:

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.

Comment:

2.5.1 City General Plan

open space, and safety), Open space removed, disregard for safety.

2.5.2 La Jolla Community Plan

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.

Comment:

La Jolla has a deficit of Parks.

BH-9 2.5.3 Land Use Designation

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	



Letter BI

Patricia Granger 8854 Robin Hood Lane La Jolla CA 92037 858 450-9441 patgranger@aol.com

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

February 11, 2014

Project Name: Hillel Center for Jewish Life Project No. 212995

Re-Circulated D EIR Due February 11, 2014

PART II Submitted February 11 2004

History of Project Changes

BI-1 3.6 History of Project Changes 3.6.1 Previous page 3-56

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,

BI-1 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.

Comment:

BI-2

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 not 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 LJSPD regulationsOrdinance. 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.

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

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 multiattached single-family residences, condominiums and townhomes.

Comment:

There are no institutions facilities within the La Jolla Highlands single-family residential community.

BI-3

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 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 hillsides and canyons.

P 4.1-4

4.0 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

BI-3 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.

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 enventory, not is project site designated as environmentally sensitive.

Comment:

BI-4

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.

EIR Sections 4.1.3 and 4.1.4 address potential impacts associated BI-5 BI-5 4.1.2 Significance Determination Thresholds with proposed variances and land use compatibility. As stated Based on the City's 2011 Significance Determination Thresholds, impacts related to land therein, the proposed deviation is temporary and would not result in use would be significant if the project would: secondary environmental effects, such as traffic safety impacts. Due · Require a deviation or variance, and the deviation or variance would in turn result to its temporary nature, this deviation would not result in significant in a physical impact on the environment: · Result in a conflict with the environmental goals, objectives, or recommendations direct or secondary environmental effects. 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 As discussed in the EIR, both the Phase 1/Phase 2 project and the land uses. Existing with Improvements Alternative would be consistent with the Comment: land use designation, goals, and policies for the applicable community plan, LJSPD ordinance, La Jolla Shores Design Manual, BI-6 Hillel's project would require a deviation and or variance and would in turn result and development regulations. Impacts would be less than significant. 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. BI-6 See response to comment BI-5. 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? BI-7 The project name was revised to clarify that the project is not BI-7 Shape Shifting affiliated with UC San Diego nor is the facility a student center, but Changing names UCSD Hillel Student Center to UCSD Hillel Center for Jewish rather a facility used primarily for religious purposes. 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 change. Bottom of page 5 and top of page 6 HCIL Student Center-Student Center struck out 1 change. P. S4 Table 1 Phase 1/Phase 2 Building gross Floor Area Summary HCL Student Center struck out 1 change, Page S 8 HCL Student Center struck out 4 changes. Page 3 -20 b HCJL Student Center four 4 mentions Student Center crossed out. Hillel Name Changes 1999 - 2014

2003 Dec. 31 Site Development Permit / Project No. 2014. Hillet 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 single family residence to commercial office space and demolitate existing deniched garage / storage building to create additional parking 2008 July 15, 2008 Hillet of San Diego Student Center (Project No. 149437) Notice of Public Moeting La Jolla Shovas Advisory Board. Project Review, Hillet of San Diego Student Center (Project No. 149437) The City Attorney: Refers to, Hillet of San Diego Student Center Project No. 149437 The City Attorney: Refers to, Hillet of San Diego Student Center Project No. 149437			
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Notice of Public Meeting La Jolla Shores Advisory Board 2008 Sept 16 2008 Project Review. Hillel of San Diego Student Center (Project No. 149437 2008 Dec 3, 2008 The City Attorney: Refers to, Hillel of San Diego	2003 Dec. 31	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	
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	2008 Dec 3, 2008	The City Attorney: Refers to, Hillel of San Diego Student Center Project No 149437	

Letter BJ



olie M. Hamilton

February 4, 2014

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

> Re: Hillel Center for Jewish Life, Project No. 212995 Comments on iterirculated Draft Environmental Impact Report

Dear Ms. Shearer-Nguyen:

I am submitting the following comments on the above Draft Environmental Impact BJ-1 Report ("DEIR") on behalf of my client, Taxpayers for Responsible Land Use ("TRLU"). These comments should be considered in addition to the comments previously submitted by my office on March 11, 2013. As the lead agency, it is incumbent upon the City of San Diego to certify an Environmental Impact Report that is objective and reflects the independent judgment of the City of San Diego. This DEIR lacks objectivity and rends as a promotion for the proposed project rather than an objective analysis of the impact of the Hillel Center for Jewish Life ("Student Center") on the environment.

> As an initial matter, the City has failed to make the DEIR available for public review as required by the California Environmental Quality Act ("CEQA"). The CEQA Guidelines require the lead agency to make the DEIR available in local public libraries. Members of TRLU were unable to review the technical appendices at the La Jolla Branch of the public library during the public review period.

Public Notice of a Recirculation of Draft Environmental Impact Report

The Public Notice of Recirculation of Draft Environmental Impact Report ("Notice") failed to notify the public the DEIR was available at the public library.

BJ-3 Executive Summary

BJ-2

The Project Description and Project Objectives place a focus on religion that is not demonstrated in the Mission Statement of Hillel of San Diego, promotional materials published by Hillel of San Diego or in the program logs attached to the Traffic Impact Analysis. The Project Objectives are artificially written to promote the proposed project as the preferred option

2835 Camino del Rio S., Ste. (OC ... San Diego, CA 92108 ... Fir. 619.276,070) ... Fx: 619.276,0705 www.imhamiltonlaw.com

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

is also available for review http://clerkdoc.sannet.gov/Website/publicnotice/pubnotcega.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.

¹⁴ Cal Code Regs \$15087(g)

As required under CEQA Guidelines Section 15125(a): BJ-4 Ms. Elizabeth Shearer-Nguyen February 4, 2014 An EIR must include a description of the physical environmental Page 2 conditions in the vicinity of the project, as they exist at the time the notice of preparation (NOP) is published. 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 The NOP was published on October 8, 2010. Therefore, the baseline Student Center will be used primarily for religious purposes. conditions are adequately described. The Venter Institute was not located there at the time the baseline was established. However, the BJ-4 Environmental Setting cumulative project analysis has been updated to include Venter Institute Figure 2-3 is outdated in that it fails to show the Venter Institute located west of the in the recirculated EIR (December 2013). See EIR Section 4.2.3.1(a) project site on Torrey Pines Road. and Chapter 7 for the analysis that includes this project. Figure 7-1 The Environmental Setting does not describe in sufficient detail the single family clearly indicates the Venter Institute as a cumulative project. 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 Hillel currently uses the Cliffridge property to provide religious Development Code. The description of current uses in the Cliffridge property is not stable and programs-including meetings, one-on-one counseling, and finite. Some sections describe the use as religious purposes while others describe the property as administrative offices—for Jewish students attending UCSD. used for administrative offices and one-on-one counseling and meetings with students. Reference to the administrative offices is within their context as BJ-5 The "Landcover" section does not accurately describe the project site and surrounding support and for the religious programs. area. This description of Landcover 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 Landcover, there is no other topic in The City's Code Enforcement Department issued a violation to the the Environmental Setting that provides a description of the surrounding area. applicant under 2001 Edition CBC Section 3405 stating: No change shall be made in the character of occupancies or use of any building BJ-6 Project Description which would place the building in a different division of the same The non-traditional organization of the Project Description makes it confusing and group of occupancy or in a different group of occupancies, unless difficult for the reader to understand the proposed project. The list of discretionary actions is such building is made to comply with the requirements of this code addressed before the project is described; this organization requires the reader to flip back and forth in the document to verify the required approvals. for such division or group of occupancy. BJ-7 The programs described in the "Project Background" section are not reflected in the The pending code violation therefore relates to the change to advertising for Hillel, the Mission Statement for Hillel or the Event Log and Calendar for Hillel UCSD attached to the Traffic Impact Analysis. religious use of the Cliffridge property, as opposed to a single dwelling unit use, and modifications required to support that use. The The list of discretionary actions fails to provide a description of the findings necessary to BJ-8 issue is intended to be resolved in connection with approval of the approve a Street Right-of-Way Vacation. proposed project. **BJ-9** 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 BJ-5 Surrounding land uses are described briefly in EIR Section 2.2 and 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 surrounding uses and neighborhood character are described in detail carport and solar panels. The maximum number of visitors anticipated to use the student center in the Existing Conditions in EIR Section 4.12.1. at any one time varies between 50 and 100 from section to section. Neither number meets the BJ-6 The content of Chapter 3 is consistent with the requirements of Section 15124 of the CEQA Guidelines. BJ-7 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

BJ-9 (cont.)
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 regards to attendance figures and facility occupancy, see **BJ-10** Ms. Elizabeth Shearer-Nguven response to comment BJ-9. February 4, 2014 Page 3 As stated in EIR Section 3.4.2.1, Shabbat services, concerts, highrequirements of CEQA to describe the whole of project, including all aspects that are a holiday services, distinguished speaker events, and other large reasonably foreseeable consequence of the proposed project. gatherings would continue to be held on campus in rented facilities. **BJ-10** The Project Description fails to describe the maximum capacity of the Student Center and Any future expansion would require an amendment to the permits anticipated expansion. CEQA requires the project description include future activities that are a foreseeable consequence of the project.2 The DEIR analysis relies on a maximum use of the and additional environmental review. At special events, a Parking Student Center that is well below capacity and is unenforceable. The Project Description must Management Plan would be implemented to assure that adequate describe use at the maximum capacity of the Student Center, including Shabbat. This maximum parking would be available. capacity must be the figure to use in comparison to the existing setting to adequately address project impacts. BJ-11 EIR Figure 9-1 shows the site plan for the Existing with As proposed, the Student Center includes an industrial-size kitchen and seating for more Improvements Alternative, including the proposed landscaping. than 100 people. The Student Center has the capacity to host Shabbat; therefore, the capability of hosting weekly Shabbat is a reasonably foreseeable consequence of approving this Student Center. As the Event Log appended to the Traffic Impact Analysis demonstrates, Shabbat FEIR Section 9.2.1 has been revised to include the following attendance currently varies from 80-150 people every Friday evening. Shabbat must be included (formerly in Section 4.1): in the project description when considering the environmental impacts of the Student Center. Representatives of Hillel have acknowledged in a variety of settings that Hillel does Because only minor modifications are proposed to the contemplate future expansion of the Student Center. This future expansion must also be Cliffridge property, the Existing with Improvements addressed in the DEIR. Alternative would not conflict with the applicable goals The Project Description fails to provide a stable and accurate description of the Existing **BJ-11** and objectives of the General Plan and La Jolla with Improvements Option. The Project Description does not provide an accurate number for Community Plan. The Cliffridge property is not located the area of landscaping that will be provided. The reader is unable to compare the Existing with on an environmentally sensitive area, coast/shoreline, or Improvements Option to the requirements of the Land Development Code without these figures. steep hillside; therefore, elements of the community plan On page 3-52, the DEIR states "Phase 1/Phase2 would be located within less than one-BJ-12 and ordinance most relevant to the project are related to quarter mile of one or more existing stops for Metropolitan Transit System." This statement is the residential character of the project site. The design inaccurate; only the 30 Route stop is located within one-quarter mile of the student center. and exterior of the property is compatible with adjacent In the "Previous Project History" section of the DEIR on page 3-55, the DEIR fails to BJ-13 residential units and would remain the same; thus, this disclose that the establishment of Hillel at 8976 Cliffridge Avenue is an ongoing code violation option would not conflict with the La Jolla Shores Design with an open code enforcement case pending. Manual. Because the Existing with Improvements Environmental Analysis Alternative would not conflict with the environmental **BJ-14** goals, objectives, and recommendations in the General The Environmental Analysis is fatally flawed because the Project Description did not describe the whole of the project and future activities that are reasonably foreseeable Plan or the La Jolla Community Plan, no impact would consequences of the project. In addition, the conclusions are not supported by substantial result. evidence in the record and the DEIR fails to bridge the analytical gap from evidence to conclusion. 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 ² Laurel Heights Improvement Ass'n v. Regents of Univ. of Cal. (1988) 47 C3d 376; 14 Cal Code Regs §15126. (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

BJ-13 (cont.)
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.
BJ-14 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.

BJ-15

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BJ-15 LAND USE

BJ-16

BJ-17

BJ-18

On page 4.1-13, the DEIR states the approximate 10-foot setback from La Jolla Scenie Drive North would generally conform to other neighboring building setbacks. This conclusion is not supported by substantial evidence in the record. The setback analysis in Figure 4.1-1 clearly shows that no other structures present a facade of 170 feet located 10 feet from the property line. As Figure 4.1-1 shows, the typical development pattern is garages placed within 10 feet of the property line with the majority of the residence deeply set back from the front property line. Figure 3-12b demonstrates the dominance of the walls of the Student Center along the southern property line, unlike any other structure setback in the vicinity. On page 4.12-2, the neighborhood is described as:

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.

The proposed Student Center is not consistent with the parking requirements of the La Jolla Shores Planned District Ordinance ("LJSPDO") and Land Development Code ("LDC"). The Land Use section of the DEIR fails to discuss or analyze whether the proposed Student Center complies with the parking requirements of the LJSPDO and LDC.

There is no evidence or analysis to support the conclusion that three buildings clustered together — with a total gross floor area of 7,084 square feet and set 10 feet off the property line — is in harmony with the adjacent low-density, single-family residential neighborhood. There is no basis for the conclusion on page 4,1-18 that the Student Center would blend in with the existing surrounding development.

In the discussion of compatibility with surrounding land uses, the analysis relies on a discussion of activities that is not supported by evidence in the record. The Event Log and Calendar for Hillel attached to the Traffic Impact Analysis show frequent evening programs, some with as many attendees as 450. Although it is unlikely an event with 450 attendees would be held at the proposed Student Center, there are many other events that will fikely be held at the new Student Center. The DEIR cannot rely on a maximum of 50 people when analyzing compatibility with the surrounding land uses. The DEIR must consider the maximum capacity of the Student Center, including outdoor spaces, when analyzing compatibility with surrounding uses. Certainly a Wednesday evening program that starts at 9:00 pm and has 150 attendees is not compatible with the surrounding single-family residential uses.³

Hillel is proposing a 7,084-square-foot Student Center approximately 50 feet from existing low density, single-family residential uses. The Student Center and adjacent outdoor spaces can accommodate significantly more than 100 people. Hillel has a history of hosting its

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-16 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

² See Event Log in Appendix E of the Traffic Impact Analysis that is Appendix B to the DEIR.

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.

BJ-16 (cont.) 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. See response to comment BJ-15. BJ-17 BJ-18 See response to comment BJ-9.

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largest events in the evenings, sometimes starting as late as 9:00 on a weekday evening. This use is not compatible with the surrounding land uses. There is no evidence to support the conclusion that the proposed Student Center would not generate large amounts of visitors. The proposed Student Center is not compatible with the surrounding land uses, therefore the Student Center would cause a significant land use impact.

The proposed Student Center and the Existing with Improvements Option will result in significant land use impacts because both conflict with the provisions of the applicable general plan, community plan and municipal code.

B.J-19 TRANSPORTATION/CIRCULATION/PARKING

BJ-20

BJ-21

The analysis of the Student Center's impact to Transportation/Circulation/Parking is fundamentally flawed because the Project Description fails to consider the whole of the project and foresceable future activities that are a consequence of the project. The Traffic Impact Analysis assumed a maximum of 100 people in attendance at any one time. This analysis must be based on the maximum capacity of the facility including outdoor spaces. Similarly, the usage described in this section is not consistent with usage shown in the Event Logs and Calendars attached as Appendix E to the Traffic Impact Analysis.

The Traffic Impact Analysis cannot assume that Shabbat services will be held offsite based on the Project Description provided by the applicant. The proposed Student Center includes facilities capable of accommodating Shabbat. Shabbat must be included in the Project Description as it is a foreseeable future activity that is a consequence of approving the Student Center.

This section of the DEIR fails to consider or provide any information on the impact to Cliffridge Drive and Glennbrook Way. The analysis concludes only one car per day will leave the Student Center and turn right on La Jolla Scenic Drive North. The traffic analysis assumes all visitors leaving the Student Center will make a U-turn at La Jolla Scenic Drive and Caminito Desco. The traffic analysis then states the Student Center would be required to install a stop sign on Caminito Desco, but does not make this a mitigation measure. Regardless, Caminito Desco is a private street, and the project applicant cannot require action by a private property owner to mitigate potential impacts offsite.

The traffic analysis also states that the reduced street width along La Jolla Scenic Drive North is adequate according to the Street Design Manual. The Street Design Manual allows a 32-foot street width for local streets serving 1500 trips per day. The 2030 condition anticipated 1490 trips per day on La Jolla Scenic Drive North. The DEIR has failed to consider full use of the proposed Student Center and is deeply flawed. It is likely that consideration of the full use of the Student Center will show an additional 10 daily trips on La Jolla Scenic Drive North. This level of traffic will exceed the capacity of the street as proposed. Therefore, the proposed Student Center will have a significant impact on Traffic on La Jolla Scenic Drive North.

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.

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-

BJ-21

BJ-21 (cont.)

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.

BJ-22 Ms. Elizabeth Shearer-Nguven February 4, 2014 Page 6 project. BJ-22 The traffic analysis fails to consider future phases of development on the Scripps Institute of Oceanography Upper Mesa (site of the Venter Institute). **BJ-23** The parking demand analysis is flawed and based on false assumptions.4 In addition, this analysis fails to consider foreseeable future activities that are a consequence of approving the Student Center. The analysis is based on grossly underestimated attendance. There is no basis for the conclusion that the provision of an enhanced pedestrian **BJ-24** environment and ample bicycle parking facilities would mitigate or minimize the impact of the loss of nine on-street parking spaces. This conclusion is not supported by evidence in the record. In addition, the DEIR fails to bridge the analytical gap from evidence to conclusion. The project site is located in a Parking Impact Area for the UCSD Campus. None of the provisions for sidewalks and/or a bike path spanning an area previously occupied by a cul-de-sac will mitigate the loss of on-street parking in this area. **BJ-25** There is no evidence to support the conclusion that adequate sight distance is observed at the project driveway. The DEIR states the "Caltrans Highway Design Manual" specifies 200 feet of stopping distance on roadways with a speed limit of 30 miles per hour. This driveway would be located 150 feet from the intersection of La Jolla Village Drive and La Jolla Scenic Way: therefore, sight distance would be inadequate. This failure to provide adequate sight distance will increase traffic hazards for motor vehicles, bicycles and pedestrians due to nonstandard design features. Therefore, the Student Center will result in a signficant impact related to traffic hazards. BJ-26 BJ-23 Similarly, 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. Although the DEIR states Hillel would be required to install a stop sign on Caminito Desco, Caminito Desco is a private street and Hillel has no authority to install a stop sign in this location. Therefore, the Student Center will result in a significant impact related to traffic hazards at this intersection. **BJ-24** BJ-27 BIOLOGICAL RESOURCES The mitigation measure proposed to mitigate potential impacts on raptors and breeding or nesting birds is not adequate and is not consistent with the recommendations of the Biological Survey attached as Appendix C. In this survey, 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

See letter from Julie Hamilton to Elizabeth Shearer-Nguyen dated March 11, 2013.

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.

BJ-23 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.

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.

BJ-24 (cont.)

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.

- BJ-25 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-tosouthbound 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.
- BJ-26 See the response to comment BJ-20.
- BJ-27 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.

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.

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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.

BJ-28

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 43.4 dB(A)Leq. The Noise Ordinance limits sound levels to 45 dB(A)Leq for single-family residences during the evening hours. Based on Event Logs, the Student Center's current use can exceed 150 people at 9:00 on a Wednesday 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 will likely exceed the limits established in the Noise Ordinance. Therefore the proposed Student Center would have a significant noise impact.

BJ-29

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.

BJ-30

The neighborhood adjacent to the project site is initially described as "suburban in character; residences here are single-family and mostly one-story rambling-style structures with sloped overhanging roofs and large front yard setbacks." Figure 4.1-1 provides further evidence of the setbacks of the neighboring buildings. Hillel proposes a wall approximately 170 feet long, set back 10 feet from the southern property line. This setback is in distinct contrast to the adjacent setbacks as shown in Figure 4.1-1. There is no evidence to support the conclusion "the approximate 10-foot setback from La Jolla Scenic Drive North would generally conform to other neighboring building setbacks." In fact, the proposed 10-foot setback does not generally conform with neighboring building setbacks and will represent a significant land use impact and a significant impact related to development features.

BJ-31

On page 4.12-23, 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

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 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.

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.

⁵ Page 4.12-2;

An overview of the landscape plan is shown in EIR Figure 3-10 and its plant palette is provided 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 landscapeing. 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 4-14, the proposed on-site structures would range in size from 984 square feet to 3,298 square feet. The average size 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 neighborhoot. The project size also would be substantially screened from view. See response to comment BJ-29.	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	BJ-29 (cont.)
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Ms. Elizabeth Shearer-Nguyen February 4, 2014 Page 8

floor area of 7,084 square feet. When considering the neighborhood character, the salient aspect of the Student Center is the physical presence the center imposes on the neighborhood – the size as perceived from the surrounding area. The use of net square footage in this section fails to properly analyze the impact the Student Center will have. This section then compares the proposed Student Center to the existing neighborhood and concludes the three Student Center buildings clustered together and representing 7,084 square feet would not exceed the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin. This conclusion is not supported by substantial evidence in the record, and the DEIR fails to bridge the analytical gap from the evidence to the conclusion. In particular, a 7,084–square-foot Student Center is not consistent with a neighborhood characterized as "suburban in character; residences here are single-family and mostly one-story rambling-style structures with sloped overhanging roofs and large front yard setbacks."

BJ-32

The DEIR wrongly states the project site is not located in a highly visible area on page 4.12-28. The project site is prominent and highly visible from La Jolla Village Drive, one of the primary entries into the community of La Jolla. This section then goes on to state the Student Center would not contrast with the surrounding development or natural topography through excessive height, bulk, signage or architectural projections. This conclusion in not supported by substantial evidence in the record. This section should include a photo of the project site taken from westbound La Jolla Village Drive and elevations showing the carport and solar panels over the surface parking on the cast side of the project site.

The elevations provided in the Project Description section of the DEIR do not provide a perspective as seen from La Jolla Village Drive traveling westbound into La Jolla. The east elevation does not show the carport and solar panels above the parking lot as described in the Project Description. The proposed Student Center is 7,084 square feet; the largest single-family residence adjacent to the project site is 3,464 square feet. The vars majority of homes in the vicinity of the project site are less than 2,500 square feet. The proposed Student Center contrasts starkly with the surrounding development with the possible exception of the theater buildings on the UCSD campus. These buildings are screened from La Jolla Village Drive and the surrounding area by tall trees and heavy landscaping.

The proposed Student Center is a sharp contrast to the character of the surrounding community and located on a visibly prominent project site that is one of the primary entrances to the community of La Jolla. The Student Center will have a signicant impact on Neighborhood Character. Growth Inducement

BJ-33

There is no evidence to support the conclusion that the Student Center would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively. The analysis fails to bridge the analytical gap from the evidence to the conclusion. Based on the history of Hillel, there is no merit to the argument that the area is

BJ-32

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.

BJ-33

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.

F Page 4.12-21, Table 4.12-1; Figure 4.12-3.

BJ-35

BJ-37

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substantially built out, preeluding other student organizations with a religious affilliation 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. Hillel, 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 Cumulative Impacts

The DEIR fails to consider full build-out of the Venter Institute project site.

BJ-35 Project Alternatives

The "No Project" Alternative must disclose the discretionary approvals required to allow Hillel to continue to use the Cliffridge Residence. The current use of the Cliffridge Residence is a code violation and the Neighborhood Code Compliance Division of the Development Services Department has an ongoing open case against Hillel. Hillel will likely be required to either vacate the Cliffridge Residence or receive a Site Development Permit to resolve this code violation. The discussion under the "No Project" Alternative must identify the potential outcome of the ongoing code compliance case and cannot assume the use will remain.

BJ-36

At best, the "No Project" Alternative is the same as the "Existing with Improvements"

Option, therefore the DEIR has failed to explore a reasonable range of alternatives.

BJ-37 Mitigation Monitoring and Reporting Program

The Mitigation Monitoring and Reporting Program ("MMRP") is inadequate and there is no evidence the MMRP will mitigate the potential impacts below a level of significance. The DEIR discusses a number of situations that will be a condition of project approval and are necessary to mitigate impacts. Not all of these potential conditions of approval are proposed as enforceable mitigation measures. The mitigation measures proposed are not adequate and will not mitigate significant imapets to biological resources.

The DEIR discusses the following as conditions of approval but does not require any action via an enforceable mitigation measure:

BJ-34 See response to comment BJ-28.

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.

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.

See Attachment A to letter from Julie Hamilton to Elizabeth Shearer-Nguyen dated March 11, 2013.

Ms. Elizabeth Shearer-Nguyen February 4, 2014 Page 10

> Artificial limitations on the capacity of the proposed Student Center (although these limitations would be an illegal "piecemealing" of the project)

- Hosting of Shabbat at a different location (also illegal "piecemealing" of the project)
- · Installation of a stop sign on Caminito Deseo

BJ-38 BJ-39

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.

BJ-40

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 stable 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

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.

Letter BK

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

YEAR AGO.

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 ENCLOSE WITH THIS NEW RESPONSE, A COPY OF MY LETTER FROM A
- 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

BK-1 This comment is an introduction to comments that follow. No further response is required.

BK-2 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/pubnotcega.html.

The City provided adequate notice of the EIR under CEQA.

WAS UNABLE TO LOCATE ANY APPENDICES. THE APPENDICES SHOULD HAVE BEEN PART OF THE RECIRCULATED DOCUMENTS AVAILABLE FOR REVIEW AT THE LIBRARY. ON JANUARY 8, 2014, I BECAME AWARE OF A "RED-LINE" COPY OF THE CURRENT RDEIR. WHY WAS A "RED-LINE" COPY NOT AVAILABLE NOR MENTIONED AS AN OPTION WHEN THE NOTICE OF RECIRCULATION WAS MADE ON DECEMBER 6, 2013? MOST CITIZENS ARE UNAWARE OF THE "RED-LINE" COPY THUS ARE AT A DISTINCT DISADVANTAGE WHEN TRYING TO DETERMINE CHANGES IN THE CURRENT RDEIR. THE DEVELOPMENT SERVICES DEPARTMENT SERVES INDIVIDUALS/ORGANIZATIONS WITH SPECIAL INTERESTS/GOALS BUT YOU ALSO HAVE RESPONSIBILITIES TO ORDINARY CITIZENS AS WELL IN TERMS OF OBJECTIVITY AND TRANSPARENCY. WHY DO YOU MAKE THE "PLAYING FIELD" SO UNBALANCED? THIS IS SAD.

BK-4 WHAT FOLLOWS ARE MY RESPONSES TO PERCEIVED CHANGES AND OMISSIONS IN THE RDEIR.

LOCATION OF THE PROPOSED STUDENT CENTER: HILLEL CLAIMS THERE ARE APPROXIMATELY 1800 JEWISH STUDENTS CURRENTLY ENROLLED AT UCSD AND THE PROPOSED CENTER WILL BE A CENTRAL SITE FOR THESE STUDENTS, THE RDEIR FAILS TO NOTE THE DISTRIBUTION OF JEWISH STUDENTS AMONGST THE SEVERAL COLLEGES WITHIN THE UNIVERSITY. IT APPEARS THAT IN CONTRAST TO A DECADE AGO, MOST STUDENTS WHO RESIDE ON CAMPUS, LIVE IN RESIDENCE HALLS NORTH OF THE INTERSECTION AT NORTH TORREY PINES ROAD AND LA JOLLA SHORES DRIVE, SOME LIVING NEARLY 2 MILES FROM THE PROPOSED STUDENT CENTER SITE. THE PROPOSED STUDENT CENTER IS NO LONGER AN EASY WALKING DISTANCE FOR MANY STUDENTS.

RELIGIOUS USE: THERE IS A STRIKING INCREASE IN THE USE OF WORDS BK-5 IMPLYING RELIGIOUS USE, RELIGIOUS PURPOSE, RELIGIOUS ACTIVITY. RELATIVE TO THE PROPOSED STUDENT CENTER. THIS ISSUE HAS BEEN ADDRESSED IN DETAIL PREVIOUSLY BUT BECAUSE THE RDEIR HAS CHANGED WITH MUCH GREATER EMPHASIS ON "RELIGIOUS USE" TO JUSTIFY LOCATION OF THE PROPOSED STUDENT CENTER IN A SINGLE-FAMILY RESIDENTIAL ZONE, A RESPONSE MUST BE RESTATED. THE PROPOSED STUDENT CENTER IS NOT A CHURCH, SYNAGOGUE OR TEMPLE. THE INTENT OF THE LA JOLLA SHORES PLANNED DISTRICT ORDINANCE (LJSPDO) IS CLEAR. THE BUILDINGS APPROVED IN THE LISPDO ARE PLACES OF WORSHIP TO A DEITY. THIS IS NOT THE MISSION OF A HILLEL STUDENT CENTER, IT HAS BEEN STATED MANY TIMES AND IN SEVERAL WAYS, I.E. THE UCSD HILLEL WEBSITE, THE SDSU HILLEL WEBSITE, THE NORTH COUNTY HILLEL WEBSITE AND THE NATIONAL HILLEL WEBSITE, "HILLEL ENCOURAGES STUDENTS OF ALL

BK-3 The current recirculated EIR (December 2013) did not include redlining 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.

BK-4 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 1/4 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

BK-4 (cont.) 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
permitted use within the residential zone in accordance with the City Municipal Code.

BK-6

BACKGROUNDS, TO FORM DEEP PERSONAL CONNECTIONS TO JEWISH LIFE, LEARNING AND ISRAEL THROUGH JEWISH EXPLORATION, LEADERSHIP, AND A SENSE OF BELONGING. WE PROVIDE OPPORTUNITIES FOR STUDENTS TO BUILD LIFELONG CONNECTIONS TO THEIR JEWISH LIFE, TO EACH OTHER AND TO JEWISH COMMUNITIES WORLDWIDE". THIS REPRESENTS EXTENSIVE OPPORTUNITIES FOR JEWISH STUDENTS TO GROW SOCIALLY AND CULTURALLY BUT THE HILLEL MISSION, AS STATED. IS NOT FOR RELIGIOUS WORSHIP SERVICES.

AS NOTED, "RELIGION" AND RELIGIOUS SERVICES" ARE NOT MENTIONED AS HILLEL MISSIONS; MOREOVER, AS SHOWN ON PAGE 3-15, TABLE 3-1, MERELY 15% OF USEABLE SPACE IS DEVOTED TO LIBRARY/CHAPEL. THUS THE PROPOSED STUDENT CENTER REMAINS IN DIRECT VIOLATION OF THE LJSPDO.

- BK-6

 THE UCSD HILLEL WEBSITE IDENTIFIES THE HOME AT 8976 CLIFFRIDGE.

 AVE AS THE "POTIKER/HILLEL" HOUSE. IT IS LABELED AS AN "OFFICE",

 NOT A PLACE OF WORSHIP OR RELIGIOUS ACTIVITY. AS NOTED

 PREVIOUSLY, CONVERSION OF A SINGLE-FAMILY HOME IN THIS

 RESIDENTIAL AREA, INTO A MULTIUSE OFFICE BUILDING, IS ALSO IN

 DIRECT VIOLATION OF THE LJSPDO AND MUNICIPAL CODE-131.0401.

 THIS HAS BEEN A VIOLATION FOR A DECADE. THERE HAS BEEN NO

 EFFORT TO APPLY FOR A RESIDENTIAL HIGH OCCUPANCY PERMIT.
- BK-7 STREET VACATION: PLEASE PROVIDE THE DETAILS OF YOUR FINDINGS TO JUSTIFY STREET VACATION ON LA JOLLA SCENIC WAY N. YOU ARE AWARE THAT ALL OF FOUR FINDINGS MUST BE MET TO JUSTIFY A STREET VACATION. THE LIST HAS BEEN OFFERED REPEATEDLY THUS I CHOOSE NOT TO DO IT AGAIN BUT WILL APPRECIATE YOUR STATED JUSTIFICATION. THERE IS NO BENEFIT TO THE COMMUNITY, ONLY TO HILLEL.
- LAND USE: TRAFFIC/PARKING: VISUAL EFFECTS/NEIGHBORHOOD: BK-8 WHY DOES THE RDEIR LACK CONSISTENCY WITH THE PROJECTED NUMBER OF STUDENT ATTENDEES AT THE PROPOSE STUDENT CENTER? WHY IS THERE NO MENTION OF FUTURE EXPANSION? AFTER ALL HILLEL REPRESENTATIVES HAVE A STATED INTENTION OF FUTURE EXPANSION. THE CENTER'S DESIGN LENDS ITSELF TO EXPANSION AND THE FACILITIES, INCLUDING A COMMERCIAL-SIZE KITCHEN, ALSO PROVIDE CAPABILITY TO SERVE 200 OR MORE. IT IS MY UNDERSTANDING THAT CEQA REQUIRES PROJECT DESCRIPTIONS TO INCLUDE FUTURE ACTIVITIES AND GROWTH AS POSSIBLE RESULTS OF THE PROJECT. YOUR RDEIR USES A NUMBER WELL BELOW THE MAXIMUM CAPACITY AND CANNOT BE ENFORCED. YOU SHOULD INCLUDE SHABBAT IN YOUR ANALYSIS SINCE THE PROPOSED STUDENT CENTER HAS THE CAPABILITY OF HOSTING THIS EVENT. THERE SHOULD BE PARKING AND TRAFFIC ANALYSIS BASED ON MAXIMUM ATTENDANCE. IT IS CLEAR THAT WHEN A

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).

- BK-7 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.
- BK-8 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

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.

RATIONAL CONSIDERATION IS GIVEN TO THIS ISSUE, ONSITE PARKING IS GROSSLY INADEQUATE AND WILL THUS LEAD TO SIGNIFICANT TRAFFIC AND PARKING ISSUES FOR THE SURROUNDING NEIGHBORHOOD.

- EXAMINATION OF PHOTOS DEPICTING THE PROPOSED PROJECT SHOW CLEARLY HOW MUCH THE BUILDING DIFFERS FROM THE CURRENT CHARACTER OF THE NEIGHBORHOOD. THE RDEIR ATTEMPTS TO GLOSS OVER THIS POINT BY CLAIMING THE "CLUSTER-MODE" OF THE PROPOSED CENTER IS QUITE LIKE THREE HOMES SIMPLY CLOSE TOGETHER. WHEN ONE VIEWS THE PHOTOS IT IS OBVIOUS THE CENTER IS CLUSTERED BUT NONE-THE-LESS QUITE APPARENTLY ONE UNIT. THERE IS NOTHING LIKE IT IN THE NEIGHBORHOOD. MOREOVER, THE RDEIR FAILS TO INCLUDE PHOTOS OF THE CARPORT AND SOLAR PANELS ON THE EAST SIDE OF THE PROPOSED CENTER. THE PROPOSED CENTER IS SIMPLY IN SHARP CONTRAST TO THE NEIGHBORHOOD.
- BK-10
 THE VENTER GENOMIC INSTITUTE IS INCLUDED IN THE RDEIR BUT THERE IS FAILURE TO INCLUDE FUTURE PLANS FOR AT LEAST TWO, PERHAPS THREE ADDITIONAL BUILDINGS ON THE SITE. TRAFFIC ANALYSIS SHOULD BE EXTENDED TO INCLUDE THE FUTURE PLANS.
- BK-11 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.

SINCERELY,

OLIVER W. JONES , M.D.

BK-9

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.

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.

BK-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.

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 no raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

Letter BL

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. 212995/2010101030

Community Plan Area: La Jolla

Council District 1

FROM: Oliver W. Jones, M.D.

8635 Cliffridge Ave.

La Jolla, CA 92037-2113

BL-1

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/pubnotceqa.html.

The City provided adequate notice of the EIR under CEQA.

My comments will be based on review of the most recent document, the recirculated DEIR (RDEIR)

- BL-2

 SUBJECT: Hillel Center for Jewish Life (HCJL), until the current edition of their proposed project, was in previously known as Hillel of San Diego Student Center. Although the name is changed (HCJL) the concept remains the same, a UCSD-affiliated Student Center. HCJL seeks SITE DEVELOPMENT PERMIT and PUBLIC RIGHT-OF-WAY VACATION in order to develop the Student Center. The site for this proposal is well documented. If approved, the Student Center will have a significant environmental impact on the single-family residential community of La Jolla Highlands.
- BL-3

 The La Jolla Shores Planned District Ordinance (LJSPDO)
 permits church, synagogue, temple, of permanent nature, USED
 PRIMARILY FOR RELIGIOUS PURPOSES. The stated description
 for Hillel of San Diego is a service to Jewish undergraduate and
 graduate students at institutions of higher education across San
 Diego county. Students 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 a Jewish community.
 The Hillel of San Diego Mission Statement states: "To be a
 vibrant Jewish campus presence and to involve the maximum
 number of university-age Jews is 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 society
 - Advocating for Jewish student needs on campus and in the community

BL-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.

The EIR discusses all potentially significant impacts associated with project implementation.

BL-3 See response to comment BL-2.

2

- Linking the campus community to a 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.

This does not appear to show the proposed Student Center being used "primarily" for religious purposes. In contrast, at least two of the colleges at UCSD, Revelle and Muir, offer beginning through advanced courses on the Hebrew language and Judaic history, culture, religion. The RDEIR should explain how the proposed Center is to be used primarily for religious purposes. More accurately it is simply a student center, a study center with some office space, a kitchen for social gatherings, rest rooms, showers and as such these are not permitted uses—university facilities are not allowed in the LJSPDO.

Hillel has occupied a single-family home at 8976 Cliffridge Ave. BL-4 since 2004, converting its use to administrative offices for all of Hillel of San Diego. This too is in violation of the LJSPDO; singlefamily homes in La Jolla Highlands cannot be converted to multiple offices. In spite of complaints from neighbor residents, City has thus far refused to act on this violation. The home has offices, not a place for worship and certainly not a place used PRIMARILY for worship. The RDEIR should explain justification for this violation and should provide information as to who owns that property. S.1 Project Synopsis describes activities at 8976 Cliffridge Ave. as "administrative offices, one-on-one counseling and meetings with students" Please help me understand how these activities constitute use "primarily for religious purposes"? S.1 Project Synopsis also describes situations in which Hillel would seek permanent use of the home at 8976 Cliffridge Ave., but it is not clear the intent for use. Please clarify this and also clarify how Hillel intends to obtain ownership of that property. The final sentence in S.1 Project Synopsis, implies the 8976 Cliffridge property might be converted to permanent use (offices) under certain circumstances in the project proposal. Please explain how Hillel intends to acquire the 8976 property. Again, who currently owns that property? This begs the question, if Hillel can acquire

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.

3

BL-4

BL-4 (cont.)

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.

BL-5

the single-residence property and convert it to office use in violation of the LJSPDO, what is to keep other individuals from selling their residence to another religious-affiliated organizations for conversion to a "student center" or administrative offices in a residential neighborhood? There are at present some 50 or so certified organizations with religious affiliation on the UCSD campus. Thus far City has shown remarkable reluctance to uphold the LJSPDO code for single-family residential use. This is a serious precedence.

BL-5 S. 1.2- Within the RDEIR, Hillel describes a survey of Jewish students at UCSD including a result that 80% of those responding intend to walk from campus to the proposed student center. Responding students have a vested interest in the proposed center being constructed and of course, a vested interest in making it appear that most would walk thus helping to mitigate impact on traffic and parking issues. A survey under these circumstances is fatally flawed. Why the location at the southern end of UCSD campus? Distance from the proposed construction site to the most distal end of student housing on campus is 1.9 miles. Is the proposed center only for those students residing at the southern end of UCSD? Do most Jewish students have university residence on Revelle or Muir campuses, nearly 1 mile from the propose site? What percent of Jewish students live within the most proximal colleges, i.e. Revelle and the most distal?

BL-6

S.5- Description of alternative sites is confusing; the primary alternative sites appear to be simply variations on the project scope and with one exception (Site 675) no alternative for the location. The RDEIR fails to offer a reasonable range of alternatives, including site, that could affect impacts. There is no discussion of impacts on Land Use, Transportation/Parking, Neighborhood Character. One alternative, the Reduced Project, eliminates the Library/Chapel (15% of total) plus the second floor of the Student Center but retains use of 8976 Cliffridge

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

BL-5 (cont.)

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.

BL-6 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

BL-6 (cont.)

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

BL-6 (cont.)

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.

The Recirculated EIR (December 2013) contains a map with the location of the Site 675 Alternative within Chapter 9, Alternatives (see Figure 9-1).

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 653) 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.

BL-7 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 653 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.

BL-8 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 15% 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

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.

5

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.

BL-9 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.

BL-10 3.3.1 and 3.3.1.1 Phase 1/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 3 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 145 ft. long, set back some 10 feet from the property line and directly across the street from several singlefamily 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 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

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BL-9 See response to comment BL-2.

BL-10 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.

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 145 ft. along La Jolla Scenic Drive N. is lack of consistency with setbacks for homes within the La Jolla Highlands neighborhood.

BL-11 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.

BI-10 (cont.)

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.

BL-11 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 culde-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.

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BL-11 (cont.) 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.

BL-12 A street right-of-way vacation as proposed would narrow the street hardscape 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.

BL-13 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 UCSD 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 Glonbrook 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.

BL-12 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.

BL-13 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 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.

BL-14

Presently, traffic flow on to Cliffridge Ave. and hence to La Jolla Scenic Dr. N from the intersection of Torrey Pines Road and Glenbrook Way, is substantial especially during morning and evening commuting hours. With street vacation on La Jolla Scenic Dr. N., traffic impact would be even more significant. The RDEIR needs more clarity in addressing the cumulative impact of the Venter Institute and HCJL

- BL-14

 The Hillel project seeks a curb cut on the west side of La Jolla Scenic way at the entrance to the Student Center parking area. A curb cut at site proposed results in a significant traffic hazard. At the intersection of La Jolla Village Drive and La Jolla Scenic Way, cars in two lanes turning left from La Jolla Village Drive plus cars turning right at the same intersection, all merge into a single lane only to become impeded by cars slowing to turn into the Student Center parking area. Within the past month or so, there have two significant collisions, one involving 3 cars, at this intersection. The curb cut proposal offers more hazardous conditions for drivers and vehicles. A curb cut on La Jolla Scenic Way may also violate the dedication of La Jolla Scenic Way as part of the mitigation of development along Gilman Drive.
- BL-15

 The RDEIR states that for the most part, maximum attendance at the Student Center will be approximately 50 persons; large events, i.e. Shabbat meals will not be held at the Center but of course this estimate is not binding and completely unenforceable. It is in Hillel's best interest to encourage as many students as possible to share what the Center has to offer thus projections should be based on maximum or peak use instead of an estimate both unrealistic and unenforceable. It is the occupancy load of the Center that is critical. The proposed Center will have approximately 3000 sq. ft. of assembly space, approximately 980 sq.ft. of chapel/library and 1000 sq.ft. of office space offering an approximate occupant load of 290 individuals. It is this maximum use figure that is critical.
- BL-16 In contrast to a statement in the RDEIR, "there are no specific parking regulations for the proposed use of Phase 2 of the Hillel Student Center Project in the City's Municipal Code", the LJSPDO and the Municipal Code section 1510.0107 (a) and

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-tosouthbound 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."

BL-15 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

BL-16 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.

142.0530(c), Table 142-05F state parking regulations. If the RDEIR argues that Hillel is primarily a religious organization then code requires "1 parking space per 3 seats or 30 per 1000 sq.ft. of assembly area if the seating is not fixed". Hillel proposes 27 parking spaces equivalent to 900 sq. ft. of assembly area. The three buildings proposed by Hillel amount to approximately 6500 sq.ft. Figures in the RDEIR show 120 seats thus requiring at least 40 parking spaces. Other estimates based on various calculations of assembly area suggest a parking space need of between 48 and 90 spaces. Add to this the loss of 6-8 street parking sites if there is a street vacation, the negative impact on the neighborhood because of inadequate onsite parking and spillover on to neighborhood streets is quite apparent. If the Center is not a religious institution, parking is still an issue because of the number of individuals who might occupy the Student Center facilities during peak activity. The proposed number of parking spaces falls short of the minimum required for the number of users expected to use the Student Center. The RDEIR fails to provide the number of staff personnel expected to use the facility parking area daily. This number reduces further parking spaces available for student attendees. Students will park on the surrounding residential streets producing a negative impact on the neighborhood.

BL-17

The RDEIR states that approximately 50 students will be at the student center during the day and evening. As noted above, the occupant load for the center is around 290 and Hillel rightly will try to encourage all Jewish students to be part of the Hillel Student Center. Thus the RDEIR should consider maximum use because any smaller number is unenforceable. Even 50 students at one time, both inside the buildings or in outside assembly space will create noise. The Center would be available to student groups until 10:00 PM and again noise control is unenforceable, Imagine a neighbor hosting a social gathering for 40-50 people one or more nights each week until 10:00 PM. Noise from people attending a student center activity will impact the

BL-18 Visual Effects of the Student Center

neighborhood.

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BL-17 See response to comment BL-15.

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.

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 DREIR 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 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.

BL-19 Summary

BL-20

BL-21

- 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 LJSPDO.
- 5. For the past 9 years, the home at 8976 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

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BL-18 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 Phase1/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.

BL-19 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.

BL-20	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.
BL-21	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.

BL-22	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	BL-22	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.
	vacation provides no advantage/improvement for the residential neighborhood but increases traffic hazard	BL-23	With respect to the traffic analysis of Glenbrook and Cliffridge, the Phase 1/Phase 2 project would generate a total of eight peak hour
BL-23	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.		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
BL-24	The RDEIR offers misleading figures concerning the number of students expected to utilize the Student Center.		not warranted.
	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		With respect to the safety of U-turns, EIR Section 4.2.5.1(a) states the following:
	presented in the DEIR thus impacting parking along		Outbound traffic oriented to La Jolla Village Drive would make a
BL-25	residential streets in the neighborhood. 7. Figures provided in the DEIR provide ample evidence the		southbound to northbound U-turn at the intersection of La Jolla
DE 20	proposed cluster of buildings at the Center are far out of character in bulk and scale with the residential neighborhood.		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
BL-26	8. An EIR 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 675 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		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.
	southern end.		Therefore, potential traffic safety concerns noted by the commenter
	I appreciate the opportunity to respond to this RDEIR.		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
	Sincerely Officer W. Jones, M.D.		perform the U-turn during the PM peak hour.
		BL-24	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
	12		Final EIR has been revised to detail proposed attendance levels. As detailed therein,

BL-24 (cont.)

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.

BL-25 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

BL-25 (cont.)

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.

BL-26 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:

BL-26 (cont.)

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

BL-26 (cont.)

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

BL-26 (cont.)
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.

BM-2

Letter BM

Kuster 8470 Whale Watch Way La Jolla, CA 92037

January 22, 2014

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

DSDEAS/aisandiego.gov

Subject: UCSD Hillel Center for Jewish Life, Project No. 212995 (hereforth: "Student Center")

Dear Ms. Shearer-Nguyen

BM-1

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 for 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.

BM-2

The current block of 8900 is used for pubic 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

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.

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.
See also response to comment AE-1.

	non-car travelers to share the road safely. The street vacation would reduce the safety for all those transiting the street. Finding (a) cannot be made.	BM-3	See response to comment BM1.
BM-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.	BM-4	EIR Section 4.2.5.1(a). La Jolla Scenic Drive North is classified as Local Street in the La Jolla Community Plan. Per the City's Stre Design Manual, Residential Local Streets are typically to provide 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 3 feet from curb to curb. Thus, the reduction of the roadway width fro
BM-4	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.		
BM-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.		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.
BM-6	Do not let special interests push the City of San Diego into making poor decisions that fly in the face of written and documented land use, zoning, and practical interpretation of decades of recorded documents. Thank you, Luttor The Kusters		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.
		BM-5	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-6	This comment is a conclusion to the comments that were responded to above. No further response is required.

Letter BN

Larson-Kuster 2420 Torrey Pines Road B101 La Jolla CA 92037

January 22, 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

Subject: UCSD Hillel Center for Jewish Life, Project No. 212995 (hereforth: "Student Center")

Dear Ms. Shearer-Nguyen

BN-1 I am writing to let you know of a serious inaccuracy 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 topic of the inaccuracy is Precedent. When reviewing the DEIR, one reads:

"development of the project would not encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively."

There is no logical path that can lead one to accept this statement as truth. Positioning a Student Center with a self-proclaimed University affiliation, purported to be religious, in the single-family residential area sets a precedent for future organizations to replicate this development.

There are scores of religiously affiliated organizations affiliated with UCSD. To allow one organization to build an industrial sized building in a single family neighborhood is essentially the equivalent of allowing all other religiously affiliated organizations associated with UCSD to do the same. As there would be precedent set for positioning this non-R or R-1 zoned structure in the neighborhood, it can safely be stated that it would be a matter of time that the existing homes could eventually become non-R (residential zoned) or non-R-1 (residential zoned) structures.

There would be no justifiable way to stop the expansion of UCSD organizations into and on top of the established single-family neighborhood. Each organization would be able to cite the Hillel development as precedent and support for their development. The development of Hillel's Student Center would create a path to pave over an existing quiet and lovely neighborhood, which was built, ironically, to support the UCSD professorial staff, which transferred to the area at the birth of UCSD.

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

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.

function.

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 Luder

BN-2 See response to comment BN-1.

BO-1

Letter BO

maxandkaia [maxandkaia@san.rr.com] From: Sent: Wednesday, December 18, 2013 1:06 PM Anitra wirtz. Erik ATT Cell Gantzel; susan moore project: HILLEL CENTER FOR JEWISH LIFE Project No. 212995 (comments from resident living in a different neighborhood) Subject: HILLEL CENTER FOR JEWISH LIFE Project No. 212995 This land was planned as open green space (trees!) connecting to green space down the middle BO-1 of LJ Scenic Drive North, (let's still do that... black asphalt now... why can't it be completed as planned?) BO-2 The roads are crazy busy here with UCSD bound bicycles and pedestrians in danger crossing @ the signal. The neighborhood residents are stressed out by the UCSD people trying to get free street BO-3 parking -- thus the 2 hour limits imposed. The Venter Institute is pushing the limits with its new building (on a very large piece of **BO-4** Please prevent any building on this tiny triangle endlessly battled for by the Hillel group. There is no room for more cars & more activities there. Make it green space & plant the trees. Thank you:

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.

BO-2	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.
BO-3	This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
BO-4	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.

Letter BP

2866 Jacoby Creek Road, Bayside, CA 95524 02.10.14

Re: Hillel Center for Jewish Life Project No.212995

- BP-1 Dear Ms. Shearer-Nguyen:
 Please find below my comments in response to the draft
 Environmental Impact Report (dEIR) re-issued for the Hillel
 Center for Jewish Life (HCJL). I request that my response to the
 dEIR submitted by certified mail to the prior dEIR in early 2013
 be included for the record.
- BP-2 I would note, for the record, that a Public Records Request submitted on 12.23.13 regarding both the 2012/2013 dEIR and the preparation of this dEIR has not been fulfilled by the City of San Diego, and I reserve the right to add comments to the dEIR at a later date should those comments have relevance to this dEIR because City of San Diego staff have not responded to the request in the timeline guaranteed by the San Diego City Clerk.
- BP-3 In late 2013 I requested an underline-strike out version of the dEIR be provided for the public so that I/we might understand (as majority laypeople) why the this dEIR had been issued, and what the material differences between the two versions are. I did not receive a positive response to this request, but at a later date a former neighbor received a copy and provided me with it. It would have been helpful for all respondents to have been afforded this courtesy, and for the DVD to have been uploaded to the City's web-site.
- BP-4 As a general question, before I add my brief response:
 What is the material difference between this dEIR and that of
 2012/13 beyond the endless strike-out of anything that would
 appear to render a use secular, replaced with the word
 'religious'? As a lay person it simply appears to be a game of
 semantics designed to influence decision-makers in favor of a
 project. As we enter year 15 of this project I would like a
 clear answer from the City as to how many MNDs, dEIRs, etc., a
 project can merit.

Sue Moore More

- 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.

General Project Information

BP-6

BP-5 "...(the project cannot be located on land owned by UCSD due to church and state separation issues."

This reasoning is not contained in the document. UCSD has many programs on campus for religious groups, including Hillel which has held services on campus for years. The original reason back in 2000 was that: exclusive use by a religious group was not permitted, but shared use of a building, office, etc., was operating procedure.

Further, HCJL is not a UCSD organization, and UCSD does not have to provide a building for non-affiliated groups.

Why has the applicant, once again, changed name, affiliation and title? Please review the numerous changes since 1996.

p.2 How many buildings in the City of San Diego are permitted to remain open in violation of Code Compliance for over a decade?

How many buildings in the City of San Diego are permitted to remain open in violation of Code Compliance because they are pending the development of another site while allowed the place holder that should the development of the other site fail, the City of San Diego will guarantee approval of the out-of-compliance site WITHOUT following both the San Diego Council Policies, and the process of local community hearings prior to approval.

It would appear that this project provides a precedent for allowing non-conforming uses to be guaranteed as a backup plan.

Why bother with local planning decisions when the final decision can be written into the application?

p.5 - 6 Reduced Project Footprint on Vacant Parcel Alternative

BP-7 How is a 1.34 acre development footprint a reduction of 33 percent? It is either 0.8 acres, or 0.2 acres ... then we get 1.34 acres as a 33% reduction without further explanation.

BP-4 (cont.)

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 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.

BP-7 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.

BP-8	Why does the site have to support the religious growth of UCSD students who are already served on site by a plethora of affiliated on-site and off-site organizations?	BP-8	This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
BP-8	Is the house at Cliffridge Avenue an office or is it religious? There are too many conflicting statements to analyze these various projects.	BP-9	The Cliffridge property is currently a single-family residence being used primarily for religious purposes, and is not an "office use" as the commenter uses the term.
BP-10	The initial community hearings prior to the 2002 decision in favor of Hillel of UCSD, included information that the building would be about 6,000 square feet - smaller than that now proposed. It was the 2005 building that was 13,000 square feet and that was rejected by every single decision-making except for the San Diego City Council.	BP-10	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.
BP-11	p.7 I am sure the community would fully support the Site 675 alternative since it is already 'on' UCSD's campus, therefore would not require any transportation, etc. Then 653 could revert to Open Space (as per the earlier plans and the impacts on the environment would be mitigated. The local community still has the plans (suggested by then Councilman Peters) for a pocket park in La Jolla's 'under-parked' community. In 2000 the community suggested this site and was told it wasn't suitable	BP-11	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
BP-12	Page S-3: Religious counseling etc., could be provided in the many excellent counseling programs through the various San Diego medical venues. There is office space available throughout the Golden Triangle, and UCSD provides office space for religious programs in shared use facilities.		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
BP-13	Why are the HCJL 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 HCJL 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.		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."
BP-14	Page S- 4 As a pedestrian/cycling family (albeit no longer in that community) it is never an enhancement to add more vehicles	BP-12	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.

BP-13	This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
BP-14	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.

	- cars, delivery trucks, garbage trucks, and all those required to construct the development.		
BP-15	Page S-7 Is the new development considered a means to contribute to the financial stability of an international organization?	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	Page S-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-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	Page 3-1: Wouldn't the Cliffridge property have to be brought up to the requirements of the LJSPDO?	BP-17	See the response to comment BP-6.
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-18	See response to comment BP-5.
BP-19	p3. 4 Israel-Oriented Activities: Why the strikeout of UCSD in this paragraph?	BP-19	See response to comment BP-5.
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 LJSA 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-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.

Letter BQ

 From:
 Sue Moore [sue@mind.ucsd.edu]

 Sent:
 Monday, December 09, 2013 12:00 PM

 To:
 DSD EAS

Cc: Fisher, John Subject: Hillel Project

Dear Ms. Shearer-Nguyen:

BQ-1 I received several emails this weekend from former neighbors who communicated that some people had received a notice from the City that the Hillel project's 'new' recirculated dEIR was available online. I have not received notice from the City, nor have I received the requested confirmation that my dEIR response of March was received by the City. When I submitted my response I was under the impression that the City would honor its commitment to the community and prepare a detailed response to the community's documents. In its turn, the community would prepare responses ... and so on. Well, it is December, and I have never heard a word about any DSDEAS response.

BQ-2 A few weeks ago I telephoned Mr. Fisher and asked if there would be an underline-strikeout version for this 'new' dEIR. He didn't have that information, and apparently the City didn't prepare this new document in a helpful manner.

BQ-3

Just to be clear, this will be the second holiday season during which we are to read and respond to a lengthy document. Last year we not only had to read the first document before it was pulled, but we started the new year with another version ... To be frank, the lack of communication by City staff is appalling. A simple courtesy letter - whether required legalistically/bureaucratically or not - would have gone a long way. I am sure you are quite familiar with the feelings of the community after 14 years of this failed project and the City's role in it, therefore the issuance of another dEIR at the holiday season is utterly insensitive.

BQ-4 Many of my former neighbors are in their 70s and 80s, and I am no spring chicken, so ploughing through hundreds of pages of verbiage is onerous. I can only hope that someone reviewed this dEIR for readability and organization, because the comments by Mr Varon on that subject were welcomed by those of us who read them.

BQ-5

In the meantime, I will start to review the document and wait for my notice to arrive, I will also communicate to the La Jolla Community Planning Association that the dEIR is available ... conveniently with such a tight response time that the primary planning committee for La Jolla will not meet until 2-3 weeks (depending on the holiday schedule) prior to the deadline. It almost appears that the City and Hillel did not want public input.

Yours.

Sue Moore

BQ-1 The commenter was included on the list of names the Public Notice of Availability of a 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).

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.

	standard 45-day period for review with the holidays in mind.
В	Q-4 The EIR meets the requirements of the CEQA Guidelines, including the required contents (see Sections 15120–15132) and considerations in preparing an EIR (see Sections 15140–15155).
В	Q-5 See the response to comment BQ-3. The City encourages public input on all EIRs and extended the typical review period due to the holidays in December/January in order to provide the public extra time to review and comment on the document.

	From: mary mosson [marymosson@hotmail.com] Sent: Thursday, February 06, 2014 8:00 PM To: DSD EAS Subject: HILLEL PROJECT	BR-1	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
BR-1	Attention Ms. Elizabeth Shearer-Nguyen— On November 4, 2011, I wrote you my concerns about the Hillel projected development in our neighborhood. Now I understand Hillel is still proposing its encroachment on our neighborhood. We are a residential area		Glenbrook Way, would not exceed 0.02. Therefore, impacts would be less than significant.
BR-2 BR-3	with single family housing and more traffic than we can already easily manage. The Hillel project is not at all compatible with our family oriented community. The new description of the Hillel development emphasizes religious meetings. The student center is just that—a student hangout, used daily as a place to go and meet friends. If their main purpose is for religious gatherings, there are two synagogues in the immediate area which would be available for that purpose. If one student center is allowed in the neighborhood, it would set a precedent that others might declare their right to do the same.	BR-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."
BR-4	Neighbors are happy to have UCSD close. And we acknowledge the need for students to have meeting places. An area just east of us has had and still has facilities that could be used for student use. A pedestrian crosswalk there is a safe access. The triangle which Hillel proposes to build on in our neighborhood is accessible by a very dangerous cross of La Jolla Village Drive.		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
BR-5	Site 653 is the wrong location for a student center. We are a residential area, and the limited religious use which students would make of this site do not legitlmize it as a religious institution. Mary Mosson		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

BR-3

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.

BR-4 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.

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.

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.

Letter BS

Edward A. Oleata

2870 Glenbrook Way

La Jolla, CA 92037

Ms. E. Shearer-Nguyen

Environmental planning Department

City of San Diego development service center

1222 First Avenue, MS501

San Diego, CA 92101

Sub: UCSD Hillel Center, Project #212995

BS-1

BS-2

BS-3

It has been sixteen years since this project was first planned and we citizens who live in the same area are still fighting against its adoption. The main thing that has changed in the last 16 years is that the university had DOUBLED in attendance. That means there are 100% more Jewish students which will impact the project with twice the number of attendees with twice the number of cars going to the center. The numbers that the developers project for the people attending the proposed center and the car parking spaces needed are all bogus. They will be much larger than that. In addition, the University is already projected to grow at least ten percent in the next five years. It will probably be more than that. That will bring more students to this project. We should not make exceptions to the zoning laws to allow this center. It's twice bad a project as it was when first proposed. It will adversely impact our residential neighborhood and be a bad precedent for the future. There are plenty of student facilities available on campus and many more have been built in the last sixteen years. They are available to all students. There is a large Synagogue complex a half a block south of this proposed project with a temple, meeting rooms and classrooms. I'm sure this area would be available to Jewish students if the need arises. Don't approve this project. It's a bad idea and would start a very bad precedent.

Sincerely Yours

Edward A. Oleata

BS-1

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

BS-1 (cont.)

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

BS-1 cont.)

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.

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.

BS-3 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.

BS-3 (cont.)

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 sharing space with the neighborhood synagogues, see response to comment BR-2.

Letter BT

From: Charles Perrin [chasperrin@yahoo.com]
Sent: Friday, January 24, 2014 3:55 PM

o: DSD EAS

Project Name: HILLEL CENTER FOR JEWISH LIFE, Project No. 212995 / SCH No.

2010101030

- BT-1

 Since 1966 I have lived at 8844 Robinhood Lane, two and a half short blocks from the site of the proposed student center. I have been a supporter of Hillel. My wife and I were married at the Harvard Hillel Center, I used to contribute annually to Hillel Foundation, I have participated in events at UCSD Hillel, and I will be proud of a UCSD Hillel at a suitable location. Nevertheless, I am opposed to this project because of the intrusion of such a large operation into a single-family residential area, and because of the impact on traffic, parking, and noise.
- BT-2

 A primary objective for this project is to "provide a permanent religious space ... which, because of separation of church and state issues, cannot be built on the UCSD campus (p. S-2, repeated on pp. 2, 6, S-1 S-2, S-9, 3-1, 3-2, 9-1, 9-16). Nevertheless, the current situation is that "Shabbat services typically held on Friday evenings are held on campus at the UCSD International Center" (p. 4-2-10), and it is expected that "Shabbat services ... would continue to be held on campus in rented facilities (p. 3-19), and that "Shabbat services typically held on Friday evenings would continue to be held on campus at their current location, the UCSD International Center" (twice on p. 4-2-11). Therefore I conclude that there is no issue of church-state separation that requires a permanent facility to be located off-campus in a residential area.
- BT-3

 State CEQA Guidelines require the discussion of a range of reasonable alternatives to the project, or to the location of the project, which would leasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project (p. S-6). Yet most of the alternatives, including the Reduced Project Alternative and the Environmentally Superior Alternative, also called the Existing with Improvements option, focus on Site 653. I agree that the No Project Alternative is unsatisfactory, because it does not provide for a student center. I do not agree that Hillel has exhausted all alternative locations. The Reduced Project Alternative and the Existing with Improvements option are minor variants on the main Phase I/Phase 2 option.
- BT-4

 It is admitted that the alternative Site 675 "would meet all of the project's objectives" (p. 7). It may not be as attractive a terrain as Site 653, but it does avoid locating the student center in a residential area. Applicant claims that "impacts [to Transportation/Circulation/Parking and to noise] might be considered the same as Phase 1/Phase 2." (pp. 9-18, 9-20), but in my opinion the impacts to transportation, circulation, parking, and noise of locating the Phase 1/Phase 2 Center in an existing residential area are more substantial than applicant seems willing to acknowledge.
- BT-5

 It is not my responsibility to find other locations. The sites that Hillel views as unavailable or not in their ownership may simply cost more than Hillel wants to spend. Some of those sites have become unavailable but might have been available had Hillel not continued to insist on Site 653. The preference for a permanent facility is understandable, but the feasibility of a long-term lease ought to be considered more thoroughly, rather than be automatically rejected because it does not "meet the project objective of providing a permanent religious facility on property owned by Hillel" or "provide the environment conducive to religious study and meditation". (p. 9-
- BT-6

 Other locations do exist. Certainly the stipulation that "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" (p. 9-3) is artificial, in that 1/4 mile is an arbitrary distance and the designation of the southern portion of UCSD, rather

BT-1 This comment is an introduction to the comments that follow. No further response is required.

BT-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.

BT-3 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

BT-3 (cont.)

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.

BT-4 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

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.
BT-5 See response to comment BT-3. See also EIR Sections 9.1 and 9.2.4 for a discussion of alternate locations.
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.

than of the center of UCSD, is an obvious bias toward Site 653. Actually, it is not the southern portion of UCSD but the extreme southwestern corner of UCSD that is nearest to the proposed site. The entire southern portion of UCSD ought to be included, and other locations that are 0.5 mile from there are on La Jolla Village Drive and on Nobel Drive. Also, to the east there are locations on Regents Road that are 1/4 mile from Mesa Housing, which is at the southeast corner of UCSD campus. The vacant sites at Judicial Drive and Executive Drive that are mentioned (p.9-3) may be 2.25 miles from the extreme southwestern corner of UCSD, but the intersection of Executive Drive and Judicial Drive is 0.5 mile from the southeast corner. The proposal concludes that because the vacant sites are not close to the preferred southwestern corner of the UCSD campus, no further consideration was given to acquiring a vacant lot in other areas (p. 9-3). This is a narrow view of the possibilities.

BT-7

I do not believe in the validity of Hillel's survey of 115 students at UCSD, which found that approximately 80 percent of them stated that they would walk to the Hillel facility at its proposed location (p. 4-2-10 and 4-2-41). Of course students supporting the HCJL have an incentive for providing an overly optimistic estimate of the number who will walk a distance of up to 2 miles (from the most distant dormitories). The comparison with the number of students who walk to events at UCLA and UCSB is not an adequate measure of the number who would walk at UCSD, because parking on campus at UCLA and UCSB is severely restricted, so that far fewer students have cars available.

BT-8

BT-9

The proposal requests a right-of-way vacation for a portion of La Jolla Scenic Drive North, along with the cul-de-sac on that street. The total area of the right-of-way vacation would total 0.49 acre (p. 3-42). The stated goal is "to enhance the pedestrian environment through construction of sidewalks and landscaping features" (p. 8-4, repeated on pp. 3-6, 3-51, 4-1-6, 7-6). In my opinion construction of sidewalks and landscaping features could be achieved by utilizing the land that Hillel owns. That utilization might entail additional expense or reduction of plans, but it would not require a transfer of public property to Hillel. I object to the proposed right-of-way vacation because it would narrow La Jolla Scenic Drive North and thereby delay my travel and that of my neighbors to and from La Jolla Scenic Way and La Jolla Village Drive. Besides, the narrower roadway increases the likelihood of collisions involving ears making sharp turns and drifting into the lane of oncoming traffic. Despite this danger, the proposal concludes that the right-of-way vacation "would not pose a hazard to vehicles" and that "impacts related to traffic hazards ... would be less than significant: (p. 4-2-47), but the basis for this conclusion is the observation that "few vehicles turn into the cul-de-sac", rather than any consideration of the acute angle at the intersection of La Jolla Scenic Drive North and La Jolla Scenic Way. Figure 4.2-2 shows a more significant level of traffic around that corner, and it should be noted that that figure is drawn to minimize the sharpness of the turn, as can be seen by comparing it with Figure 4.2-10.

BT-10

In summary, Lurge the City of San Diego Planning and Development Services Department to reject the application for a Hillel Center to be located at Site 653.

Charles L. Pertin

BT-7

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.

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.

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.

BT-9 See response to comment BT-8.

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

BT-9 (cont.) Village Drive onto La Jolla Scenic Way. Vehicles making eastbound-to-southbound right turn from La Jolla Village Drive o La Jolla Scenic Way would travel at lower speeds due to the turn radius and yielding to pedestrians. Approximately 125–150 fee stopping sight distance would be required. To achieve the requistopping sight distance, 25 feet of red curb would be provided to north of the proposed driveway.
BT-10 The comment is a conclusion to the previous comments. No furt response is required.

Letter BU

Ms. E. Shearer-Nguyen Environmental Planner 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. 212995

Dear Ms. Shearer-Nguyen

BU-1

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 fee 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:

10

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 Alemative 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 13,4000-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 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:

- 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-desac in the right-of-way which is being used for both vehicular traffic and parking.
- The public will benefit from the action through improved use of the land made available by the vacation;
 - 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
 - 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.
 - Vehicular traffic will be affected and the cul-de-sac providing both a place for turning around and parking will be lost.

- J. CraigVenter Instititue 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 Rerserve of the UCSD Park.
 - a. There are projected to be 4 buildings on this site.
 - 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 medium will be constructed on Torrey Pines Road from La Jolla Village Drive to prevent left turn in/out movements.
 - d. Vehicles leaving the Institute and going to the freeway will need to
 - ii. Continue down Torrey Pines Rd to La Jolla Pkwy (unless they want I-5 N)
 - iii. 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.jevi.org/cms/sustainable-lab/planning-documents/

Local Planning Groups - The dEIR fails to mention that this project (in its many iterations) has historically been denied by the local planning groups. 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,
 - Findings cannot be made: for the continued existing office use of the singlefamily 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.

Site Development Permit for Phase1/Phase2 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
- The proposed development will not be detrimental to the public health, safety and welfare; and
- 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 SIGNICANT contrast to the homes directly across the street. These lots are approximately 10,000 square feet in size with homes of approximately 2,000-2,3000 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
- Wouldn't being able to buy/sell/use single family homes as offices be a SIGNIFICANT impact for both Land Use and Neighborhood Character?

Land Use Precedent: 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"

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://tonga.ucsd.edu/studentorgregistration/RdOnlyList.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!

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?

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 used by: residents, people cutting through the neighborhood bypass the signal at Torrey Pines Road (which will be exasperated by the Venter 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 HCJL in the City's Municipal Code, therefore a use-specific parking study and analysis was completed for the HCJL....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 inches 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 than the appropriate standard is 30 spaces / 1,000 square feet or 195 spaces.
- If Hillel, 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 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?
- 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 ?? spaces on Torrey Pines Road due to the Venter Institute.
- The dEIR incorrectly determines Parking Demand (page 4.2-33 and Appendix B) based
 on site-specific surveys from UCLA Hillel (where parking is provided via a pay student
 lot across the street), UCSB Hillel, and UCSD Hillel (is it appropriate to use a survey
 from the site being evaluated?) and based on average parking rate for California Hillel
 (again, averages are miscalculated as UCLA Hillel parking is not available on-site, but is
 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:

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 Ltrs	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

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/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 Phase1/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-one-one counseling and meetings with students" a currently allowed use under the La Jolla Shores Planned District Ordinance?
- > 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 has been allowed to use a singe-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?

- 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"?

Reduced Project Alternative

DEIR Summary, page 5: under the Reduced Project Alternative, "two structures – The Library/Chapel along with the second floor of the HCJL Student Ceneter – 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 are 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?
- > What additions / modifications could be made without additional permits?
- 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 13,400 –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 alterative 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 feasibly 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?

Introduction

Page 1-1, "University of California San Diego (UCSD) Hillel Center for Jewish Life Project (HCJL)"

- · 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, "The project site includes two parcels: a 0.2-acre parcel (344-13]-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 lamp posts at the site.
- . Birds of prey are often seen in pairs as this may also be a mating 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 344-120-4300)?
- · 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?

2.0 PROJECT DESCRIPTION

Page 3-1 "Hillel currently uses the Cliffridge 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 Cliffridge 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 Cliffridge 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 HCJL 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.
 - a 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?

LETTER

RESPONSE

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 HCJL 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 ¼ mile? If a student has a class on the northeast side of campus, wouldn't it be more than ¼ mile to reach the proposed project site?
 - O UCSD offers and extensive 'free' shuttle system for students that travels throughout the campus, the UTC area, to UCSD Medical Center in Hillcrest, Thorton 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?

Ltz

3.3 DISCRETIONARY ACTIONS

Page 3-5: 3.3.1.1 Site Development Permit

"A SDP is required for development within the LJSPD..."

- 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 is 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 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?

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 Alernative provide for a sidewalk where the existing and often used footpath currently is?

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 home 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 courty ard."

- · 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 "7 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 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/turn 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?
 - o Page 3-8
 - o Figure 3-2 (page 3-9)
 - o Figure 3-3 (page 3-10)
 - 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 cleanup) 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

a. 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 532 (133 * 4) 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. HCJL 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 HCJL 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?
 - o 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?
 - O 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?
 - o 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?
 - o Will smoking be allowed on the exterior balcony areas? In the outside courtyard?

II

e. Parking, page 3-20 "There are no specific parking regulations for the proposed use of Phase 2 of the HCJL in the City's Municipal Code; therefore a use-specific parking study and analysis was completed for the HCJL.... 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 inches 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 than the appropriate standard is 30 spaces / 1,000 square feet or 195 spaces.
- If Hillel, 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 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
 - o On La Jolla Scenic Dr North (due to ROW Vacation)?
 - o 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 site 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 as 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 red curbing?
- . Isn't La Jolla Scenic Way an unusually heavily trafficked street used by
 - Neighborhood Residents
 - o Parents whose children attend Torrey Pines Elementary School
 - Deople going to use the La Jolla YMCA
 - o People going to the two synagogues on La Jolla Scenic Dr North
 - o Students and threatre-goers looking for parking
 - 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 Cliffridge property would be relocated."

- · Where and how would it be relocated?
- . Is there a Figure to show the new configuration?

Page 3-45, "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 as 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 to 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 3-45, "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 SIGNFICANT 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 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?

34 feet Proposed street width

(3) feet 18 inch Parking allowance from edge of curb (both sides of street)

(15) feet Parked cars - 7.5 feet average width of a car x 2 cars

(15) feet Cars driving in both directions (7.5 feet x 2)

I 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?

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 is 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 even 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 residences for "administrative offices and one-onone 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 \$976 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 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.

4.0 ENVIRONMENTAL ANALYSIS

LAND USE

Page 4.1-1, "The project site contains the Cliffridge property that currently serves as the Hillel office"

- INACCURACY: The existing use should be described as a single-family residence at 8976 Cliffridge Ave. A property which is not currently owned by the applicant.
- The use of the single-family home at 8976 Cliffridge 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 & culde-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?

Page 4.1-6, "According to the LJSPD 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://ucsdhillel.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 would other religious organizations be able to buy single-family homes in this neighborhood to provide a place for "learning, communitybuilding, 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 dEIR only addresses the deviation from Driveway Curb 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,
 - Findings cannot be made: for the continued existing office use of the singletamily 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.
- 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 its
 inconsistency with the land development code.

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 (Montesorn, 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 in not feasible or practical".

Table 42-1 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 that 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-travelled footpath that is used by pedestrians.

Page 4.2-9, "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 Cliffridge 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 Desco 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?
- How many existing 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 trash 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 chose 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 Cliffridge Ave and out to Torrey Pines Rd? This will create additional circulation
 through an already congested neighborhood.

Page 4.2-16/20 "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:
 - o UCLA Hillel?
 - o UCSB Hillel?
 - a USD Hillel?
 - o 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 county...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:
 - o 4-5 parking spaces where the cul-de-sac would be removed
 - o 20 parking spaces along the north side of La Jolla Scenic Dr N
 - o 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?

3.1

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 Venter)

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 dEIR 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 entrance is TWO CLOSE to the intersection.
- . La Jolla Scenic Way is a highly trafficked road use by:
 - v Residents of La Jolla Highlands
 - o Residents of La Jolla Shores (trying to avoid the light at Torrey Pines Road)
 - o UCSD students looking for parking
 - Parents going to Torrey Pines Elementary & other private schools
 - o People going to the YMCA
 - o People going to the two synagogues
- "It is possible that drivers could choose to make an illegal southbound to northbound uturn on La Jolla Scenic Way to La Jolla Scenic Drive North"
 - This is a very real possibility.
 - Omission: dEIR fails to address the possibility that drivers may u-turn in the residential driveways along La Jolla Scenic Drive North
 - Omission: dEIR 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 1 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?

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:
 - o It is located in a multiple dwelling zone, not a single-family zone
 - a 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 a not a valid comparison.
 - Hillel UCSB 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:
 - o Outdoor gatherings of students
 - People talking to each other and on cell-phones as they come and go from the facility
 - D 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 feets 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?"

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 condominium 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 8,500 square feet lot.
 Hillel 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?
- Hillel 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

K Rebeiz

La Jolla Scenic Drive North La Jolla, CA 92037

Letter BV

Ms. E. Shearer-Nguyen Environmental Planner 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 (previously known as Hillel of San Diego Student Center II), Project No. 212995, second recirculated DEIR

Dear Ms. Shearer-Nguyen,

BV-1 Thank you for providing the second recirculated Draft EIR for the subject project, previously known as Hillel of San Diego Student Center II. This letter should be considered IN ADDITION to the comments previously submitted on March 11, 2013

BV-2 Notification/Communication

Even though I live directly across the street – within 25 feet of the project site - I did **NOT** receive the December 6, 2013 Public Notice of a Recirculation. Nor did I receive any notice that the comment period had been extended from January 28, 2014 to March 11, 2014.

I am listed on Page II – K. Rebeiz – as "Other Agencies, Organizations and Individuals" that "received a copy or notice of the draft EIR and were invited to comment on its accuracy and sufficiency."

- . Why did I not receive the Public Notice?
- What is the process / policy for notifying people who will be directly impacted by this
 project (for example, those living within 300 feet of the project site)?
- BV-3

 A red-line version of changes was NOT posted on the City's website nor was it available at the public library. This document and appendices are over 400 pages long and it is extremely difficult to tell what has been added, changed, deleted without a red-line copy.
 - . Why was a red-line version not made available for public review?

2/11/14

- BV-1 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.
- BV-2 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 notices included a website indicating where the EIR could be found.
- BV-3 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:

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.

BV-4 The Preface to the Recirculated Draft EIR, P-1, states that "Section 15088.5(g) of the CEQA Guidelines requires a summary of the revisions made to the previously circulated Draft EIR" which included: planned development proejcts 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

- 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 S-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 dEIR"? Why are these changes not reflected in the Summary of Revisions?

BV-5

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.

BV-6 "Phase 1/Phase2 could also dedicate a 0.05-acre area along the northern property frontage to the public ROW."

· What does the above sentence mean?

BV-4 See response to comment BV-3. The Preface to the recirculated EIR in both versions provided an accurate summary of the revisions made to each document.

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.

BV-5 See response to comments BV-3 and BV-4.

BV-6 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.

2/11/14

	Project Alternatives	BV-7	The discretionary approvals required for each alternative are as follows:
BV-7 BV-8 BV-9 BV-10	Project Alternatives It is hard to keep track of the various Project Alternatives and what discretionary approvals are required for each option. In order to compare them, can you provide a one-page summary of the project alternatives and related discretionary approvals required? Would the "No Project Alternative" require a SDP or a Change of Use permit? Would this alternative also require Hillel to convert the garage back to a garage? "Reduced Project Footprint" Alternative — involves a permanent change of use permit to convert the house at 8976 Cliffridge to permanent office use for Hillel. Please confirm—the current use is NOT allowed under the LJSPD? Would this "change of use" permit be only for this particular property? Would it set a precedent for other "change of use" permits in this neighborhood? "Site 675 Alternative"—the applicant has not truly proposed an alternate site. When they say this is—the only, vacant and available non-LICSD owned site "near the UCSD campus"—what range are they using? This project has been in process since 2003—were other sites "available" during that time? Aren't the various Project Alternatives really just two versions of the same project? Phase1/Phase2 Project = development of Site 653 Existing with Improvements Option = continued use of 8976 Cliffridge Ave. No Project Alternative = continued use of 8976 Cliffridge Ave. Reduced Project Footprint = development of Site 653 Site 675 Alternative = not truly a viable alternative to consider	BV-8	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.
	2/11/14	BV-9	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"

BV-9 (cont.)

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.

CEQA Guidelines Section 15126.6 requires a discussion of a **BV-10** 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.

BV-11 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.

Executive Summary

BV-12 Project Location and Setting

The project location and setting does not provide readers/decision makers with enough detail or description of the surrounding area "Urban/developed land uses, roads, and ornamental landscaping comprise the dominant land cover in the area surrounding the project site".

- To the south of the project, on La Jolla Scenic Drive North, are single family detached homes approximately 2,000 square feet homes on 10,000 square feet lots.
- To the north of the project, across La Jolla Village Drive (6 lane road) is UCSD buildings which are mostly hidden behind dense landscaping
- To the west of the project, across Torrey Pines Road is the Scripps Upper Mesa Area which currently includes the J. Craig Venter Institute and proposed 3 additional buildings
- To the east of the project, across La Jolla Scenic Way, are single family attached homes approximately xxx.
- The project is located at the top of the hill when driving west from 1-5 towards UCSD, Birch Aquarium, La Jolla Playhouse and Torrey Pines Road, the main artery into La Jolla Shores and downtown La Jolla

BV-13 Proposed Objectives / Project Description

These sections do not provide readers/decision makers with any detail about the maximum capacity (as opposed to proposed maximum use) of the proposed project and any anticipated future expansion.

- BV-14 Areas of Controversy—"the original project includeda large community gathering space for Shabbat services and weekly Shabbat programs".
 - · What is the maximum capacity of the Phase1/Phase2 student center?
 - Would the currently proposed student center be able to accommodate Shabbat services or weekly Shabbat programs in the future?
 - Has the applicant agreed to a Conditional Use Permit that would limit the number of programs and the attendance?

BV-12 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.

BV-13 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.

BV-14 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.

2/11/14

Project Description The Project Description does not give a good description of the "Cliffridge property" and how it BV-15 is currently being used. I find it very misleading and not at all objective that the dEIR continually refers to the singlefamily residence at 8976 Cliffridge Ave as a "residential structure" or as the "Cliffridge property". It should be made clear to readers and decision-makers -. That the "structure/property" at 8976 Cliffridge Avenue is a single-family residence that is NOT being inhabited by a family, but is instead being used by Hillel o "as an office/administrative space" - wording from previous recirculation o "for religious programs" - new wording in this recirculation BV-16 . That the current use at 8976 Cliffridge Ave would require ?? a SDP or a Change of Use permit - I am actually not clear based on the information provided? · Please clarify - do both the "Existing with Improvements Option" & "No Project Alternative" require discretionary approvals (SDP for development within the LJSPD or Change of Use) to allow Hillel to continue this use at the home at 8976 Cliffridge Ave. **BV-17** . That despite on Open Code Violation with the Neighborhood Code Compliance Division of the Development Services Department, the current use has been allowed to continue since 2003 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." If the SDP were not granted, would Hillel continue to be allowed to operate from 8976 Cliffridge Ave? · Would approval of a SDP or Change of Use Permit for such use, set a precedent that would allow any other institution with a religious affiliation to purchase (or have a supporter/donor be able to purchase) another home in the neighborhood for similar use? BV-18 . Is it a reasonable expectation when you purchase a home in the single-family residential zone that the neighbor a couple of houses away might be a non-profit organization where people come to work Monday-Friday? . That the garage at 8976 Cliffridge Ave has been converted to a room and is no longer BV-19 functioning as a two-car garage. Is this 'remodel' in violation of the Land Development Code? That due to the garage conversion, Hillel staff currently park along La Jolla Scenic Drive North taking up available on-street parking in a Campus Parking Overlay zone.

BV-15 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.

BV-16 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.

BV-17 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.

- BV-18 This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
- BV-19 See response to comment BV-17. Upon project approval, adequate parking would be provided to support the new facility.

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		e Phase1/Phase2 project is not approved, Hillel would permanently use the Cliffridge erty to provide,"	BV-20	Pursuant to CEQA, the decision makers would be able to approve one of the proposed alternatives in lieu of the proposed project.
		Please clarify – if Phase I/Phase2 is not approved, then Hillel does NOT automatically get the Existing with Improvements Option? That option would require still require discretionary approval – true? If so, this wording is misleading. It assumes – if not approved, then the other is granted.	BV-21	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.
1	The F	retionary Actions Project Description is followed by the Discretionary Actions which makes it very hard to stand	BV-22	The second recirculated EIR (December 2013) does not include a Section 3.3.1.3.
BV-21		Can the Project Description include the necessary related Discretionary Actions?		515 0 11 0 10 11 11 11 11 11 11 11 11 11 11
BV-22		The ROW Vacation details are split into two sections - 3.3.1.3 and 3.4.2.1i which makes		EIR Section 3.4.2.1i includes all details relative to the ROW vacation.
5, 22		it very difficult to get a complete understanding of what is being requested.	BV-23	The City would be required to review and approve the findings
BV-23	*	The dEIR fails to provide a description of the findings necessary to approve a Street Right-of-Way Vacation.		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.
BV-244 BV-246 BV-246 BV-246	a o o	It is not clear that the Street ROW vacation proposes to narrow this street by 2 feet in order to provide the enhanced pedestrian environment. It also gives no description of La Jolla Scenic Drive North specifically – O Can the applicant provide the "enhanced pedestrian environment" without narrowing the street? O The description should not some special things about this section of La Jolla Scenic Drive North specifically: It is located in a Campus Parking Overlay zone With the opening of the Venter Institute on Torrey Pines Road – 16 onstreet parking spaces were eliminated. It has 2 hour parking limits on both sides of the street due to traffic / parking congestion due to proximity to UCSD It is fully parked on both sides at all times Monday-Friday (when UCSD is in session). It has two blind corners (1) turning from La Jolla Scenic Way onto 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.
BV-24	:	 This small residential street is used to short-cut the traffic signal at Torrey Pines Road. It is used by people going to/from La Jolla downtown and La 	D) / 0 /	required for project implementation.
BV-24	9	 It is used on weekends and evenings for parking at soccer games at Allen field and for shows at the La Jolla Playhouse. 	BV-24a	EIR Section 2.5.4.4 notes that the project site is located within the Parking Impact Overlay Zone, including campus areas.
BV-24	า	 This is NOT just a typical residential street. The description does not give the reader any insight into the current use of La Jolla Scenic Drive North. 	BV-24b	The Venter Institute did not remove any parking spaces from La Jolla Scenic Drive North.
2	/11/1	4 6	BV-24c	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.

BV-24d	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.
BV-24e	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.
BV-24f	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.
BV-24g	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.
BV-24h	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.

	Lot Coverage		
	The exisiting Phase 2 site area, without the proposed ROW vacation and dedication is 15,350 square feet. The Proposed Gross Floor Area (from Table 3-1) is 7,084 square feet.		
BV-25a	The Lot Coverage calculations are confusing and misleading. What is 5001 and 57004 (which are the 2019).	BV-25a	This is an introduction to the following.
BV-25b BV-25c BV-25d	 Why is 5,291 used instead of 7,084 (as shown is table 3.1)? Lot coverage (without ROW vacation and dedication) = 7,084 / 15,350 or 46%. Lot coverage (with ROW vacation and dedication less landscaping) = 7,084/23,541 = 30%. 	BV-25b	5,291 is the gross <i>ground</i> floor area; only ground floor area is used in calculating lot coverage.
BV-25e	 What is the lot coverage for the homes directly across the street on La Jolla Scenic Drive North (approximately 2,000 square foot homes placed in the middle of 10,000 square foot lots = 20%). 	BV-25c	Lot coverage without ROW vacation is 34.5 percent (5,291 square feet/15,350 square feet)
	3.4.2.2 Existing with Improvements Option a) Parking "for professional office uses, 3.3 parking spaces are required per 1,000 square feet of GFA"	BV-25d	Lot coverage (with ROW vacation and dedication less landscaping) = 5,291/23,541 = 22.5 percent
BV-26a BV-26b BV-26c	 Are "professional offices" an allowed use in a single-family zone? The dEIR does not state that the current RS zone limits hardscape for vehicular use to 4 surface parking spaces maximum The dEIR does not clearly indicate that the garage at 8976 Cliffridge has been converted to a room and is no longer functioning as a garage. Will this option demolish this room that used to be the garage to make room for the 6 parking spaces? 	BV-25e	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.
		BV-26a	Professional offices are not an allowed use within the zone. See response to comment BV-9.
		BV-26b	The Existing with Improvements Alternative would require a deviation to provide six on-site parking.
		BV-26c	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.
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BV-27

Upper Mesa Neighborhood - 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 Rerserve of the UCSD Park.

- a There are projected to be 4 buildings on this site (only one is built)
- Access to the project is currently via a right-in and right-out driveway on Torrey Pines Road with a raised medium will be constructed on Torrey Pines Road from La Jolla Village Drive to prevent left turn in/out movements.
- c. Vehicles leaving the Institute and going to the freeway will need to:
 - 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
 - iii 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.
- b. For more info see http://www.jevi.org/cms/sustainable-lab/planning-documents/

BV-28

Local Planning Groups - The dEIR fails to mention that this project (in its many iterations) has historically been denied by all the local planning groups. For this version of the project:

- From the 6/7/12 minutes: La Jolla Community Planning Association
 - 1. Findings cannot be made for the right-of-way vacation,
 - Findings cannot be made: for the continued existing office use of the singlefamily 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.

BV-29

Land Use page 4.1-6 discusses that the La Jolla Shores Advisory Board review all LJSPD Permit applications... When CEQA requires that an EIR be prepared in conjuction with an application within the LJSPD, the Advisory Board shall review this report before submitting its recommendation:

 The dEIR makes no mention that the LJ Advisory Board did review this application in November 2012 and that they FAILED to pass a motion in favor of the project.

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BV-27

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.

BV-28	This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. See response to comment BV-23.
BV-29	This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.

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 Scneic 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 south side of the street will be setback 20 feet and 40 feet, but the HCJL 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 includes to determine this average.

BV-32a

Page 4.1-19 Compatibility with Surrounding Land Uses

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 comparision. 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.

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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.

BV-31 (cont.)

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.

BV-32a With respect to the project's consistency with setbacks and neighborhood character, see response to comment BV-31.

BV-32b	 The two-story attached homes across La Jolla Scenic Way are at a different grade level—well below the proposed site. The UCSD buildings to the north across the six-lane La Jolla Village are set-back (how far?) and are mostly hidden from view due to dense trees/landscaping. The dEIR fails to compare the day to day use of a single-family home with that of the center? Do single-family residences generate 200 trips per day? If not, how many? Do single-family residences have industrial kitchens and bathrooms that can accommodate 50-200 people at a time? 	BV-32b	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.
BV-33	 On-street Parking Supply – page 4.2-44 Please confirm the TOTAL number of on-street parking spaces lost will be 9 or 3 on LJ Scenic Way and 6 on La Jolla Scenic Drive North? How many on-street parking spaces were lost along Torrey Pines Road – west side – with the building of the J. Craig Venter Institute? Will those spaces be reinstated when the entrance is moved from Torrey Pines Road to Expedition Way? Isn't this area within the Campus Impact Overlay zone? What does that mean? Why does the dEIR fail to mention it? Please confirm – the neighborhood will have to give up 9 on-street parking spaces and let the traffic/parking impacted street be narrowed by 2 feet in order to get "enhance the sidewalk" get some landscaping? Narrowing this street will make it difficult and dangerous for the people living on La Jolla Scenic Dr North to enter and exit their homes safely. Narrowing this street is a safety hazard. Let the City be on notice that this will create a hazardous situation and the City will be held responsible. 	BV-33	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 in 20 mph. A sight distance applying type applying the second in the
BV-34	Page 4.2-47 states "Caltrans Highway Design Manual, driveways on roadways with a speed limit of 30 mph require 200 feet of stopping sight distance the driveway would be located approximately 150 feet south of the signalized La Jolla Village Drive" • If 200 feet of stopping sight distance is required, then why is locating the driveway approximately 150 feet south of the intersection ok? Page 4.2-47 states "two vehicles turned into the cul-de-sac from Cliffridge Ave. Only seven vehicles turned into the cul-de-sac during P.M. peak hours." • Just to confirm, the existing cul-de-sac is currently being used by vehicular traffic?		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
	2/11/14 10	BV-35	were found to be less than significant. Currently, vehicles may use the La Jolla Scenic Drive North cul-desac as a turnaround area.

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"		With respect to maximum capacity, see response to comment BV-13. There is no intention for future Shabbat dinners to be held on-
	 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 dB(A) which is VERY CLOSE to the noise ordinance limits of 50 and 45 dB(A). What would the levels be for 75 people? 100 people? 150 people? 200 people? 		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? 	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	Page 4.12-21 Bulk and Scale 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 fee 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 also not really visible when considering the bulk and scale of the applicable neigbborhood.	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.
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BV-40 Page 4.12-23 - "Individual structures with an overall building net square footage of 5.772 square o Why is NET square footage used here as opposed to GFA? o Isn't GFA a better measure to use when looking at bulk & scale? o How is 5.772 calculated? The buildings are 3,298 NET + 984 NET + 1,1813 NET = 6,095 total? What Is What are the correct square footage calculations? Can you please apply them throughout the entire dEIR? **BV-41** Page 4.12-23 "the three structure would be clustered" in one location * Three structures are clustered together APPEAR as one large 7.085 square foot structure on a 15,530 square foot lot or 46% 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 . 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. BV-42 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 merge into one lane. . This is a high traffic street - it is used by o Local residents who live here Parents of children at Torrey Pines Elementary School Members of the La Jolla YMCA o Members of the two synagoges and one church D UCSD students looking for free parking 2/11/14 12

BV-40 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)

BV-41 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.

BV-42 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.

	avoid the signal at Torre Locating the site access here is Create more chaos as ca Cars will not anticipate Cars will back-up onto I La Jolla Scenic Dr North OMISSION – the traffic analysi Turning from La Jolla S	extremely dangerous as it will: rs are trying to merge from two lanes to one cars slowing to go into a driveway	5	
BV-43	analysis fails to analysis the safety of consider locating the access from La Jo the unusual blind corners on La Joll	visual effects and neighborhood character. The traffic locating the site access on La Jolla Scenic Way or olla Scenic Dr North. The traffic analysis fails to discuss a Scenic Dr N and the potential safety concerns with a street. Therefore the dEIR fails to consider feasible.	o ss h	The comment is a summary of the previous comments that were responded to above.
	2/11/14)3		

Letter BW Wednesday, January 29, 2014 3:02 PM

BW-1 NOadequate parking

How many times do we need to repeat NO to the Hillel project.

DSD EAS

site 653/Hillel

BW-2 NOadequate street access

From:

Sent:

Subject:

To whom it may concern:

BW-3 NOappropriate fit in our residential neighborhood NOincreased noise level in the evenings NOincreased college population without appropriate adult supervision Please deny this project BW-4

and stop initiating it over and over again without acceptableand safe parameters.

Judy [judyshufro@gmail.com]

BW-5 Judy Shufro

> Judy Shufro judyshufro@gmall.com for my web site click below: judithshufro.com

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.
- Neighborhood character was analyzed in EIR Section 4.12. Impacts BW-3 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.
- This comment does not raise any substantive issues related to the BW-5 adequacy or accuracy of the EIR. No further response is required.

Letter BX

Ross M. Starr, Ph.D. 8675 Cliffridge Ave. La Jolla, CA 92037 February 1, 2014

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

DSDEAS/asandiego.gov

Subject: 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:

BX-2

BX-3

BX-1 Thank you for providing the second Recirculated Draft EIR (hereinafter referred to as RDEIR2) for the subject project. I am grateful that you have managed this process gracefully and with professionalism. Note that the EIR process has taken almost 4 years and still continues, and that the inception of this project proposal goes back approximately 16 years. The following comments are provided with respect.

In a decade and a half of discussions of this project, there has been little dispute of the desirability for UCSD students of a nearby Hillel student center. Hillel The Foundation for Jewish Campus Life commands near universal respect. The only serious dispute has been regarding location of the student center and its impact on the adjacent area.

I note the following inaccuracies and omissions:

INACCURACY 1, RDEIR2 interprets HCJL as among "Churches, temples or buildings of a permanent nature, used primarily for religious purposes" without enforcing on-site parking requirements for a "church temple or place of religious assembly". The first phrase, used in the La Jolla Shores Planned District Ordinance (LJSPDO), is clearly intended to be synonymous with the second phrase, used in the City of San Diego Municipal Code. They refer to facilities for group religious assembly (churches, temples, synagogues, ...). RDEIR2 misinterprets the first phrase to include any form of religious affiliation. It treats as indistinguishably allowable, in the single-family residential zone, buildings as diverse as churches, synagogues, and --- in this case --- a student center and administrative office of Hillel of San Diego. The resultant confusion would allow a university facility, the Hillel student center, to locate in the LISPD single family residential zone without fulfilling the on-site parking requirements of a place of religious assembly.

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- 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.

BX-4

INACCURACY 2, contrary to the RDEIR2, the Hillel of San Diego proposed HCJL is not included in "Churches, temples or buildings of a permanent nature, used primarily for religious purposes" within the meaning of the La Jolla Shores Planned District Ordinance. The intent of the LJSPDO is fairly clear. It pertains to facilities for religious assembly: churches, temples, synagogues, ... It does not include a student activity center, counseling centers, drop-in centers, small group meeting facilities, or administrative offices, even of religiously affiliated institutions. But those are the functions proposed for the HCJL.

- BX-5

 INACCURACY 3. Hillel of San Diego is not 'religious' within the meaning of the La Jolla Shores Planned District Ordinance. Though the word "religious" appears dozens of times in the RDEIR2, in fact Hillel is a university student social organization with a religious/ethnic affiliation. The respective mission statements of national Hillel and Hillel of San Diego make this very clear. The mission statements are attached here in Appendix 1. They emphasize friendship, fellowship, personal identification, nationalistic support for the state of Israel, and performing good works. Notably absent are religious assembly and religious ritual. The goals set forth in the mission statements in the Appendix appear to be laudable and constructive. They are not objects of religious assembly or ritual.
- BX-6

 INACCURACY 4, Peak attendance levels are grossly understated. The HCJL will become the site of weekly Shabbat dinners hosting over 100 in attendance. The RDEIR2 notes that a previous plan for a facility twice the size of the current proposal was designed to host weekly Shabbat dinners. Though the current RDEIR2 specifies that no such plans exist for the proposed HCJL, those stated plans are not binding on future use. The HCJL floor plan includes sufficient space to accommodate well over 100 diners, a commercial-sized kitchen suitable for arranging their meals, and lavatory facilities abundant enough fully to accommodate them. There seems little doubt that eventually the facilities will be used to their full capacity for the purpose originally enunciated for the Hillel of San Diego student center. Friday evening dinners with over 100 persons in attendance will take place weekly throughout the academic year.
- BX-7

 INACCURACY 5, Parking space is grossly inadequate to regularly occurring peak usage.

 Using generally accepted standards of occupancy, the HCJL can accommodate over 200 persons for assembly and over 100 persons for dining. Twice that if all of the floor space is used. These will be regular events despite the much smaller attendance projections in the RDEIR2. It is the capacity of the facility --- not the applicant's stated attendance levels --- that determine the required on-site parking space allocation.

In the unlikely event that the HCJL be regarded as a "church temple or place of religious assembly" then the appropriate parking regulations should apply; 30 parking spaces per 1,000 square feet assembly area if seating is not fixed. There is of course a judgment call as to how large an area is suitable for assembly. It is at least 2000 sq.ft. --- twice that if all the floor space is used ---- resulting in a minimum requirement of 60 parking spaces on-site, more if we take into account the administrative offices or patio areas possible use as assembly space. Hence parking allocation in the plan is deficient by at least 55% --- up to 80% deficient.

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- BX-4 See response to comment BX-3.
- BX-5 See response to comment BX-2.
- BX-6 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.

BX-7 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.

BX-7 (cont.)

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.

BX-7 (cont.)
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.

BX-8

INACCURACY 6, Section 6.3's assertion that no precedent is set is grossly inaccurate. Section 6.3 makes an extraordinary misstatement:

"The project proposes a land use that is in conformance with existing zoning and underlying community plan land use designation for the project site. ...

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 \$01(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 LISPD 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. ...

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."

BX-9

The RDEIR2 says that no precedent for future development is set by allowing the proposed HCJL to proceed. On the contrary the project creates the following distinct precedents:

- any religiously affiliated facility not necessarily a church, temple, synagogue, or place
 of religious assembly can be developed in the single-family residential zone of the
 LJSPD.
- (ii) Any of the 54 student religious organizations on the adjacent UCSD campus must be allowed to establish an administrative office and drop-in center in the LJSPD single-family zone.
- (iii) There is no need for the religious organization to have a university affiliation. Administrative offices, outreach centers, reading rooms, missions, food pantries, homeless.

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BX-8

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 project as an allowable use at this location, see response to comment BX-2.

BX-9

With respect to precedent setting, see response to comment BX-8.

With respect to required parking, see response to comment BX-7.

BX-10

shelters, thrift shops, ..., of any religiously affiliated organization appear to be acceptable uses in the single-family residential area of LJSPD by this precedent.

- Further, the precedent establishes that on-site parking space requirements for a religiously affiliated organization structure are to be determined by the organization's estimate of attendance rather than the capacity of the facility or Municipal Code on-site parking requirements for a church or place of religious assembly.
- The RDEIR2 notes "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." The concluding paragraph of section 6.3 makes the implications this precedent clear. All that is required for a UCSD campus religiously affiliated organization to establish a facility in the adjacent residential area is that it --- or its donors --- have the money to acquire or rent a suitable property, and then convert it to institutional use. Phase 1 sets the precedent.

BX-10 OMISSION 1, Traffic Safety on the 8900 Block of La Jolla Scenic Dr., North: the RDEIR2

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. ... Thus, the reduction of the roadway width to 34 feet from 36 feet would still be in accordance with City standards. Though the RDEIR2 includes a discussion of traffic loads on La Jolla Scenic Dr. North including the 8900 block, it does not discuss the peculiar topography there.

At the intersections at the East and West ends of the 8900 block of La Jolla Scenic Drive North, the intersections with La Jolla Scenic Way and with Cliffridge Avenue, there are corners with unusual 120° turns. Thus the complex of streets has a distinctive Z-shape. with limited visibility and unusually sharp turns for traffic at the corners. This creates an unsafe driving condition, including the risk of collisions between east- and west-bound traffic on the 8900 block of La Jolla Scenic Dr. North. That danger is present with its current 36-foot width. Reduction to 34-foot width will be extremely dangerous. The danger of course will be compounded by the increased traffic circulation created by the HCJL. particularly with the attendance levels anticipated in this correspondence rather than the fallaciously low levels projected in the RDEIR2. An illustration of this issue is attached in Appendix 2.

There is, of course, a solution to this dilemma: red curbing the 8900 block, with attendant loss of on-street parking. That will have the effect of forcing on-street parking and traffic congestion further south into the residential neighborhood. This is a significant impact on the Parking Impact Overlay Zone, not treated in RDFIR2.

OMISSION 2, Traffic Safety concerns regarding elimination of the La Jolla Scenic Dr. North cul-de sac:

The cul-de-sac on the 8900 block of La Jolla Scenic Dr. North (immediately north of the Hillel office at 8976 Cliffridge Ave.) currently performs a distinct safety function. It allows traffic heading westbound on La Jolla Scenic Dr. that does not wish to enter the residential area to make a U-turn safely on the cut-de-sac and return. It allows northbound traffic on Cliffridge

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BX-11

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-tosouthbound 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.

BX-11 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 culde-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.

Avenue that does not wish to enter La Jolla Scenic Dr. or La Jolla Scenic Way to make a U-turn safely on the cul-de-sac and return. The proposed right of way vacation, including elimination of the cul-de-sac roadway, removes these avenues of safe return. The predictable result will be dangerous U-turns on the 8900 block of La Jolla Scenic Dr. and at the intersection of Cliffridge Avenue with La Jolla Scenic Dr. Since the traffic danger is perfectly predictable, the change will subject the City of San Diego to liability for creating an unsafe traffic condition.

BX-12

OMISSION 3, Findings for the Right-Of-Way Vacation: The RDEIR2 notes that a vacation of the public right-of-way on La Jolla Scenic Dr. North will be required to accommodate the proposed HCJI. plan. It does not review the findings required for vacation of the public right-of-way. These findings are stated explicitly in San Diego Municipal Code. The code is explicit; all of the findings must be fulfilled for a valid right-of-way yacation. The required findings 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 action 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.

Finding (a) cannot validly be fulfilled considering the traffic safety issues raised above under Omissions 1 and 2. Finding (b) cannot be fulfilled; there is a private benefit to Hillel of San Diego; the public benefit of landscaping the property can be achieved while maintaining the public right-of-way. Finding (c) cannot validly be made; Inaccuracies 2 through 6 noted above indicate that the La Jolla Shores Planned District Ordinance would be systematically violated by the project facilitated by the right-of-way vacation. Finding (d) cannot validly be made; the traffic safety concerns noted above in Omissions 1 and 2 mean that the purpose of the right-of-way will surely be detrimentally affected by the vacation.

OMISSION 4, driveway at the Venter Institute on Torrey Pines Road: The current RDEIR2 includes traffic projections from the Venter Institute assuming the eventual projected traffic flow onto Expedition Way. It takes no account of traffic from the driveway currently available on Torrey Pines Road.

BX-13

OMISSION 5, further development on the UCSD Scripps Upper Mesa Neighborhood near the Venter Institute on the southwest corner of Torrey Pines Road and N. Torrey Pines Rd.: Traffic projections to year 2030 include no account of projected additional facilities on the UCSD Scripps Upper Mesa site. In addition to the current Venter Institute, published plans for UCSD development include THREE ADDITIONAL STRUCTURES of similar capacity there. An excerpt from the UCSD plans is presented in Appendix 3. A full account is available at http://physicalplanning.ucsd.edu/plans/siouppermesa.html. The impact of the implied additional traffic must be accounted.

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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.

The comment reflects the opinion of the commenter, and is a BX-14 BX-14 Thank you for your personal patience and professionalism in this matter. Thank you for noting conclusion to the previous comments responded to above. No these inaccuracies and omissions in the RDEIR2. The violations of the Municipal Code and La Jolla Shores Planned District Ordinance should be noted so that the San Diego Planning further response is required. Commission and the San Diego City Council can understand clearly that denial of the project is uniquely the valid decision. Yours truly, Digitally signed by Ross M. Starr DN: cn=Ross M. Starr, c=US, c=University of California, San Diego, ou=Economics Degit, email-ration @uost.edu Retecon: I am the multon of this document. Date: 2014.02.01.13:67:60-08:00 Ross M. Starr Ross M. Starr February 1, 2014 6

Appendix 1 - Mission Statements of National Hillel and of Hillel of San Diego

Mission statement of National Hillel taken from its website (http://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.



(See 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 (tikkun olam and tzedek) 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.

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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

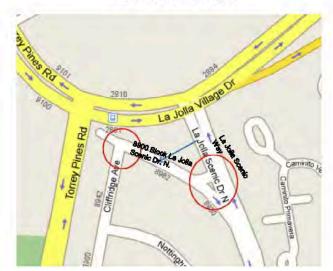
To be a vibrant Jewish campus presence and to involve the maximum number of university-age Jews in ways that foster a lasting commitment to Jewish life.

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/SUMNPS PlanElements.pdf)
downloaded January 26, 2014: following pages

February 1, 2014

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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

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 Skeleton Canyon Ecological Reserve, lower SIO, and La Jolla Cove. The Belvedere is the public component which includes the trellised walkway and the terraces and walls which extend from it to the common open space. The characteristics are defined as follows:

- Distinct edge: create grade change with a wall or bluff-like edge between the building level (the discrete landscape and the Reserve).
- Create a continuous trellised walkway linking all the four buildings. Diagrammatically, the pathway is a semicircle but can be added to and transformed while retaining continuity.
- Uses for Belvedere: incorporate both interior but "common" facilities such as conference rooms or a café and outdoor seating areas into the edge. Allow the trellised 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.
- North 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 seeing buildings through the trees in the theatre district to the north.
- · Expedition Way: the eucalyptus grove extends part way down



Belvedere Edge: A Distinct edge between the landscape of the Reserve and the building terraces.

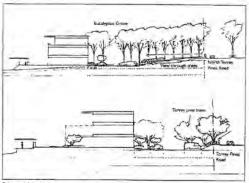


Belvedere Trellis: A continuous shade structure connects the buildings.

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Upper Mesa Neighborhood Planning Study Scripps Institution of Oceanography





View corridor in the gap between landscapes

Edge conditions

Expedition Way, and then planting changes past the buildings to low growing coastal sage scrub. The Meander 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 to the parking, the landscape setbacks are 30°-0" from Expedition Way, 60°-0" from North Torrey Pines Road, 25°-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 courryard spaces within the established parts of SIO. Many of the courts and yard areas have almost a residential scale and invite 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 focal open space. The Belvedere edge



Medniled Settrack

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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 setbacks to the Reserve and Meander. The eastern edge is defined by the pedestrian link to the corner of Expedition Way and North Torrey Pines

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 #3 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 linkage to Scripps and West Campus and should be reserved for a suitable program in this location. Phasing may be dependant on the utility infrastructure and could theoretically develop in the reverse sequence.

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	Parcel Area	Building GSF
Parcel #1	27,700 SP	32,500 SF
Parcel #2	27,300 SF	32,100 SF
Parcel #3	22,100 SF	25.800 SF
Parcel #4	31,200 SF	35,800 SF

Building Parcel Square Footages

Circulation and Parking

Vehicular Circulation

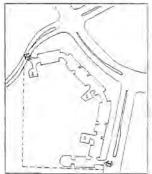
Site access will occur at Expedition Way south of the central planted median. The second connection point will be Torrey Pines Road at the southern edge of the site with a right-hand-turn-only in and out. Individual vehicular circulation links these two points with parking and roadways running parallel to North Torrey Pines Road and Torrey Pines Road.

Parking

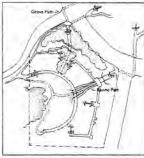
Parking occurs at 90° to the main circulation, broken-up with planting and sidewalks to demarcate crossing points. The parking is a few feet lower than the surrounding roads. A short spur road runs parallel to Allen Field. One hundred and seventy parking spaces are planned.

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Parking and service yards



Pedestrian Circulation

3. Service Yards

Individual service yards are accessed directly from the loop road and spur. 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 sidewalks 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 view corridor. The path leads to the sidewalks and the Belvedere terraces. A ramped pathway leading to the Reserve extends the view corridor.
- From the SIO campus, west of the site, the Meander path, links to the trellised 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.

Adèle Naudé Santos and Associates & Spuriock Poirier

Letter BY

F. Akif Tezcan 8975 Cliffridge Ave. La Jolla, CA 92037

Feb 10, 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

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

BY-1 Dear Ms. Nguyen, Thank you for give

Thank you for giving us the opportunity to examine the <u>second</u> 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/revisions/amendments (at all) that addresses any of our previous comments regarding the inadequacy of the DEIR and the inappropriateness of building the proposed UCSD Hillel Center for Jewish Life in the project site. As before, our 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 its true environmental impacts in a sound and scientific manner. The primary changes in the second recirculation are minor edits that de-emphasize the student-centered nature of the project and present it 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 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.

 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 andfosters 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."

BY-1 All previous responses to comments are included in the Final EIR. Any comment that resulted in clarifications to the documents are identified throughout the responses.

The document is adequate under the CEQA guidelines and provides an unbiased explanation and assessment of the project and project impacts.

BY-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.

BY-2

BY-3

This Project is not intended to build an inclusive community in the residential neighborhood in which it is proposed to be built. This stands in stark contrast to a building of religious nature (churches, synagogues etc.) located in a residential community. As such, it is not permitted under LJSPD ordinance, which is reflected in several decisions of the La Jolla Community Planning Association against the Project over many years.

2) Precedence-setting for other religious student organizations: The proposed Project sets a clear precedent for 54 other UCSD student organizations to pursue off-campus facilities in the same residential area. Indeed, this is unambiguously confirmed by the following statement in section 6.3: "... there is a potential for other UCSD student religious organizations to seek off-campus facilities in the project area". It is stated in the same paragraph that "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."

Speculative statements such as these do not eliminate or mitigate the precedence-setting nature of the Project. Just as the Hillel organization was able to raise funds to purchase Project site and develop the proposed Project, any of the 54 other UCSD student organizations with religious affiliation may purchase a residential property in the same residential area and use it as a facility, and do so without requiring further development. Whether this has a high or low probability of materializing is irrelevant. The Project would set a firm precedence for the settlement of religious UCSD student organizations in the neighborhood.

BY-4

3) Attendance numbers are incommensurate with the single-family nature of the neighborhood: It is stated in Section 3.4.2.1.a, UCSD Hillel had no less than 18 activities during with more than 30 persons during the Winter 2010 academic quarter, a 12-week period. A survey would show that events of such size happen less than once, if at all, during an entire year in the immediate neighborhood. Even during a normal weekday, an event attended more 30 or more people would create human traffic and noise that is out of character for the neighborhood. It is stated in the same section that "On rare occasion, such as the opening dedication ceremony or a "welcome back" barbeque, attendance at the HCJL could be greater than listed above, but would not be expected to exceed 100 persons at any one time." First, a congregation of 100 people in a building without significant setback from a street is grossly incommensurate with the residential nature of the project site and would have a significant noise and traffic impact. Any buildings such as churches and synagogues in the same residential zone that cater to large congregations are buffered from the street and nearby residences according to the LJSPD ordinance in order to protect the residential nature of the zone. This would not be the case with the proposed Project. Second, without enforcement, an "expectation" of attendance does not constitute reality. It means that there is a possibility that there may be more than 100 people in attendance. Indeed, the project size (3000 square feet of open assembly space, 984 square feet of library, and approximately 1000 square feet of offices) can legally accommodate more than 200 occupants,

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.

BY-4 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

BY-4 (cont.)

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.

which would have an immense impact on the quiet residential neighborhood through noise pollution, foot and car traffic.

- BY-5

 4) Operation hours are incommensurate with the single-family nature of the neighborhood: It is stated in Section 3.4.2, I.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.
- BY-6 5) Inadequacy of Parking and Inaccurate Assessment of Potential Parking/Traffic Impact: As noted in item I 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 LJSPD 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 places 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 secrion 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 LJSPD ordinance and the Municipal Code in this location that matter.
- BY-7 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, just over half of those students responded that they would carpool." There is absolutely no detail presented about how this survey was conducted, who 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 not an independent survey, and has no statistical/scientific/factual relevance. Neither attendance nor means of travel 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

BY-5 See response to comment BY-4.

Potential impacts associated with traffic, noise, and lighting were all analyzed in the EIR and determined to be less than significant.

BY-6 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.

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

BY-6 (cont.)

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.

BY-7 See response to comment BY-6.

BY-8

attendees of the current Hillel facility at 8976 Cliffridge Ave., park their cars on Cliffridge Avenue, rather than the parking spaces of the facility or even La Jolla Scenic Drive North. This is evidence that without enforcement 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 over 7000 square feet is considerably larger than any of the neighboring residences and it has many sharp lines and no setback from the street, which stand in stark contrast to the neighborhood. The mention of the large UCSD La Jolla Playhouse facilities across La Jolla Village Drive for comparison is misleading. Those buildings are nearly entirely shielded from the view of the neighborhood by significant tree coverage and by being setback from the street. Moreover, they clearly are not located in the neighborhood like the proposed Project would be; they are separated from the neighborhood by a large thoroughfare (La Jolla Village Drive) and are on university land. The Project with its large walls next to the street would not fit in the building harmony of the neighborhood; it would stand out.
- BY-9 7) Existing with Improvements Option is not allowed in a residential zone The Existing with Improvements option would allow the continued use of 8976 Cliffridge Ave. as administrative space. This is not allowed in the residential, single-family zone.
- BY-10
 8) Failure to take the added impact of the J. Craig Venter Center into account: The current traffic projections of the second recirculated draft DEIR assumes that the traffic from the existing Venter Center will primarily flow into Expedition Way and does not take into that there is a direct access from the Center to Torrey Pines Road (which will affect traffic on Cliffridge Ave.). What is more, the traffic projections over long term do not include two additional facilities on that are planning to be built on this site.

I thank you again in giving me and my family the opportunity to address the second recirculated DEIR and taking the issues we raise into consideration.

Respectfully yours,

Akif Tezcan

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.

- BY-9 The Existing with Improvements Alternative involves the permanent use of the Cliffridge property primarily for religious purposes which are allowed within the zone.
- BY-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.

Letter BZ Alexander Varon 8955 Caminito Fresco La Jolla, California 92037 (858) 455-6846 February 11, 2014 Elizabeth Shearer-Nguyen Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, California 92101 SUBJECT: Draft Environmental Impact Report SCH No. 2010101030 Project No. 212995 Hillel Center for Jewish Life 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. BZ-1 BZ-1 This comment is an introduction to comments that follow. No further 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 response is required. 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 rdEIR, 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

BZ-2	 1-1, Paragraph 2: "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)." 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, j describes the existing lot as 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 such a figure translates to approximately 0.4-acre. Is this correct? 1 acre = 43,560 sf [source Wikipedia (http://en.wikipedia.org/wiki/Acre)] 17,533 sf / 43,560 sf = 0.40250 What is the size of APN 344-120-4300 as legally described in the deed or County 	 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.
	records? 4. Why does the above sentence not use either the legally-defined area or the approximate figure calculated in Question 2? 5. Why should the proposed ROW vacation be included in the calculation of the existing conditions when the ROW vacation has not yet been approved? 6. When sold by the City, the vacant lot (referred to here as APN 344-120-4300) was identified as APN 344-120-26. Why are these numbers different?	 The EIR accurately summarizes the size of the vacant parcel. 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.
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." The name of the street to the south is La Jolla Scenic Drive North.	 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
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? 	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
BZ-5	"Permanent use of this facility would require on-site parking." 1. Why hasn't on-site parking been required before?	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
BZ-6	1-1. Paragraph 3: "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." 1. How can a property "revert" to a use from which it had never properly changed?	 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:

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).

1-1, Paragraph 4: "The Existing with Improvements option is analyzed throughout this EIR."

BZ-7

. 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.
- This is very confusing. Which project is the applicant truly proposing? Weren't these both called options in the original dEIR?
- 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 is it being analyzed at an equal level of detail?
- 5. Why aren't other project alternatives treated with the same level of detail?
- 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 2-1. Paragraph 3: "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)."
 - · Please indicate that the Cliffridge 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 2-5, 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."
 - 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 2-7 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."
 - 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?

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.

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BZ-11	3. Is the shuttle service a public transit service? Class II bicycle facilities are provided along La Jolla Village Drive and Torrey Pines Road;	BZ-11	The La Jolla Community Plan was adopted in 2004. Figure 14 of the
	however, no bicycle facilities are provided along La Jolla Scenic Way or La Jolla Scenic Drive." 1. Why is no mention made of the fact that, despite the current non-existence of facilities, La Jolla Scenic Drive North is listed as a proposed Class II Bikeway in the La Jolla		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
BZ-12	Community Plan [Page 77, Figure 14]? "Several sidewalks within the project area provide pedestrian access for the campus and		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).
	surrounding areas."		rian opuate (2013).
	 This is not true, as the project area is separated from the UCSD campus by La Jolla Village Drive and is in no way part of the campus. It would be more correct to say that several sidewalks provide pedestrian access to surrounding areas along the perimeter and through the project site. Access to the UCSD campus is obtained by crossing La Jolla Village Drive. 	BZ-12	The Final EIR has been clarified to state that several sidewalks provide pedestrian access to surrounding areas along the perimeter of the project site.
BZ-13	2-8, Paragraph 1: "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."	BZ-13	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.
	 Is it possible that the applicant, as a non-profit organization, might be granted a waiver to either the DIF or school fees? 		
BZ-14	2-8, Paragraph 4: "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."	BZ-14	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.
	1. What does "within their established standards" mean?		
BZ-15	2-8, Paragraph 6: "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."	BZ-15	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
	1. Given that the average response time for Station 9 is 5 minutes 49 seconds, what is the estimated response time from each of these three stations should Station 9 be unavailable?		responder and the one relied upon in the analysis of impacts.
BZ-16	2-9, Paragraph 3: "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."	BZ-16	This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
	1. If Level 2 calls are reprioritized, doesn't this mean that, effectively, Level 2 does not exist?		

BZ-17	 2-10, Paragraph 2: "The project site is located within the boundaries of police Beat 124 of the San Diego Police Department, Northern Division Substation." This, along with the information provided in the previous paragraph, fail to provide information to adequately assess what, if any, impact the project might have on public services. 	BZ-17	EIR Chapter 2 provides an overview of the existing Environmental Setting. 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.
BZ-18	 2-10, Paragraph 4: "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." The street name is incorrect; it should read "La Jolla Scenic Drive North." The plural use of "waters" makes this unclear; is there a single 12-inch water main or two separate mains? Isn't the cul-de-sac part of La Jolla Scenic Drive North? If only one main exists, wouldn't it be better to say, " via an existing 12-inch public water main located within La Jolla Scenic Drive through to and including the cul-de-sac"? Would any portion of the proposed street vacation include area currently occupied by the existing water main? If the cul-de-sac is vacated, what happens to the water main under it? 	BZ-18	 The street name has been corrected in the Final EIR. There is one water main within La Jolla Scenic Drive North. The EIR presents accurate information relating to the location of the water main. No revision to the Final EIR is required. 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	"There are also existing 16-inch, 18-inch, and 30-inch water mains located within La Jolla Village Drive and North Torrey Pines Road." 1. Do any of these connect to the 12-inch water main(s) located within La Jolla Scenic Way? 2. Would any connections be compromised or need re-routing due to the proposed project? If so, who would bear the costs: the applicant or the City?	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	2-10, Paragraph 5: "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." 1. Would any portion of the proposed street vacation include area currently occupied by any sewer mains? If so, what steps would be taken? 2. Would any mains or connection be compromised or need re-routing due to the proposed project?	BZ-20	1 & 2. The ROW vacation would not have any impact on sewer mains.
BZ-21	 2-10, Paragraph 6: "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." 1. This doesn't make sense. La Jolla Village Drive slopes downhill from the Torrey Pines Road intersection to the intersection with La Jolla Scenic Way, so any water flowing along La Jolla Village Drive would follow this path. Further, La Jolla Village Drive does not intersect with La Jolla Scenic Drive North, so water may not flow from the former to the latter. I am also unable to find evidence of a "ditch" between La Jolla Scenic Drive North and Torrey Pines Road, as illustrated by the photo below (Figure 1). 	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.



Figure 1

- BZ-22

 2-11, Paragraph 2: "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."
 - This information fails to provide information to adequately assess what, if any, impact the project might have on public services.
- BZ-23 2-12, Paragraph 4: "According to the General Plan, the project site is designated as primarily Residential, along with some Park, Open Space, and Recreation."
 - 1. Upon examination of General Plan Figure LU-2, "Land Use and Community Planning Element," both parcels comprising the project site are designated "Residential," with no sign of "Park, Open Space, and Recreation" apparent on the south side of La Jolla Village Drive. The nearest "Park, Open Space, and Recreation" sites appear to be northeast of the project site, on the north side of La Jolla Village Drive, and southwest of the project site, on the western side of Torrey Pines Road. If this is correct, where on the site is the "Park, Open Space, and Recreation" designation?
 - 2. General Plan Figure LU-2 also shows a fire station at this location (see Figure 2, below). Should this project then be considered to be superseding a planned fire station?
 - The presence of a fire station at this location, whether planned or superseded, suggests
 the need for an additional fire station in the general vicinity of the project. Considering
 this:
 - a. Does this this mean that fire service for the area is already overtaxed and that the addition of the project could be an additional burden on already-stretched public services?

BZ-22 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.

BZ-23 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.

- b. What plans, if any, have been made for an additional fire station in the project's vicinity and why is no mention of this made in Section 2.4.1.1?
- 4. The image below (Figure 2) was taken from the document made available at http://www.sandiego.gov/planning/genplan/jodf/generalplan/lu2gpwstreet.pdf as of 4:50 p.m., January 28, 2014. If this document is no longer current, why is it 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?



igure 2

- BZ-24

 3-1, Paragraph 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."
 - 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 "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. 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, Hillel 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 ..."
 - Does the applicant own this property? If not, would a transfer of ownership occur?
 What would happen to the vacant parcel proposed to be developed under Phase 1/Phase 2?

- 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.
 - 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.

		1	
	3. Could subsequent attempts to develop the vacant site be considered piecemealing? If not, why not?		
BZ-27	"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." 1. Does the City regularly allow project applicants the unpermitted use of facilities prior to permit approval? 2. Please provide examples of other projects in which an applicant was allowed occupation or use prior to permit approval. 3. Could such an allowance encourage the flagrant circumvention or violation of City codes? 4. What is to prevent an applicant from maintaining an unpermitted use indefinitely while repetitively applying for new permits until they are approved? 5. Could allowing a single party to maintain unpermitted use of a facility be considered preferential?	BZ-27	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.
BZ-28	3-1, Paragraph 5: "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." 1. The second objective would not truly be violated if the project were not to be built. Therefore, might it be more correct to describe the second objective as "to meet or exceed regional and state goals"?	BZ-28	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.
BZ-29	3-2, Paragraph 2: "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." 1. Since the project site is not part of the UCSD campus, would it be more correct to replace the phrase "Jewish students at UCSD" with "Jewish students attending UCSD"?	BZ-29	The project description clearly articulates that the project site is off-campus.
BZ-30	3-2, Paragraph 3: "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." 1. Since the project site is not part of the UCSD campus, would it be more correct to replace the phrase "Jewish students at UCSD" with "Jewish students attending UCSD"?	BZ-30	See response to comment BZ-29.
BZ-31	3-1, Paragraph 6: "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." 1. Given that the southern portion of the campus holds relatively few residence halls compared to other portions of campus, this would seem to conflict, in part, with the	BZ-31	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.

second objective. Further, given that one of the housing goals of the University City Community Plan is to "encourage housing for students and employees of the University and life sciences-research facilities" (University Community Plan, Page 16), it would be reasonable to consider a site closer to the eastern portion of the campus. Why then is it important that the facility be located near the southern portion?

BZ-32 3-3, Section Header: "Project Background"

- 1. This section omits any mention of the project or of the applicant's efforts to bring its vision to fruition. Wouldn't some mention of previous attempts to develop a similar facility at the project be warranted here?
- 2. Why isn't such a history included here?
- 3. Why is there no discussion regarding this particular project, such as:
 - a. What was the date of Notice of Preparation?
 - b. What was the date of Completed Application?
 - c. What were the dates of circulation for previous drafts of this EIR?
 - d. What were the reasons for the recirculated drafts?
- BZ-33 3-5, Paragraph 5: "The lead agency would first be required to select either Phase 1/Phase 2 or the Existing with Improvements option."
 - 1. Why is the lead agency "required" to select between the project and only one alternative? Couldn't the agency choose another alternative? If so, why is this sentenced phrased this way?
- BZ-34

 3-5, Paragraph 6: "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."
 - Since the applicant is currently using the Cliffridge property for non-residential use, would they be considered out of compliance with the Municipal Code?
 - 2. If so, why haven't they been cited?
- BZ-35

 3-6, Paragraph 2: "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)."
 - This sentence is confusing. Are two ROW vacations required (one for the street ROW and another for the cul-de-sac)?
 - If two are required, would findings need to be made for each? If only one is required, could the sentence be revised to reflect this more clearly?
 - Would the vacation of the non- cul-de-sac portion of La Jolla Scenic Drive North include any portion of the currently improved street?

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.

Avenue.

- 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
- 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.

BZ-34	See response to comment BZ-4.
BZ-35	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.

"The purpose of the street ROW vacation is to enhance the pedestrian environment through construction of sidewalks and landscaping features." 1. Would any portion of the proposed structures or their required setbacks overlap the area gained by such a vacation? 2. Could a sidewalk and/or landscaping be constructed without the ROW vacation? Could these be accomplished with a reduced ROW vacation (one that does not reduce the width of La Jolla Scenic Drive North)? 3-6, Paragraph 3: "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." 1. This makes for difficult reading and comprehension. Why is La Jolla Village Drive, the street on the opposite side of the project site from the proposed ROW vacation mentioned here?	BZ-36	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 This paragraph describes the 2,183-square-foot area to be dedicated to the public ROW. EIR Figure 3-7 shows the proposed row dedication.
3-6. Paragraph 6: "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." 1. How would parking for visiting students be accommodated?	BZ-38	Parking for visiting students would be accommodated in the parking lot.
3-8. Paragraph 2: "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." • Please see questions to previous similar statements regarding the nature of the current use of the Cliffridge property. 1. Why are the administrative offices referred to as "religious?" Is there a difference between religious administrative office use and non-religious administrative office use? If so, what is it?	BZ-39	See response to comment BZ-4.
3-8. Paragraph 3: "Expanded operation would occur in Phase 2 with the completion of a permanent religious use facility." 1. Will there also be facilities for other uses? If not, then the inclusion of "religious use" to describe the facility is gratuitous.	BZ-40	As a whole, the Hillel Center for Jewish Life, including all three buildings, would be used primarily for religious purposes in accordance with the mission of Hillel.
"Phase 2 would also involve the landscaping of the cul-de-sac and the vacated ROW between the Cliffridge property currently occupied by Hillel and the vacant parcel." 1. Confusing. Aren't the cul-de-sac and the vacated ROW between the Cliffridge property and the vacant parcel one and the same? What else is between the two?	BZ-41	This sentence has been revised in the Final EIR. Phase 2 would also involve the landscaping of the cul-de-sac and the vacated ROW between the Cliffridge property currently occupied by Hillel and the vacant parcel.
	1. Would any portion of the proposed structures or their required setbacks overlap the area gained by such a vacation? 2. Could a sidewalk and/or landscaping be constructed without the ROW vacation? Could these be accomplished with a reduced ROW vacation (one that does not reduce the width of La Jolla Scenic Drive North)? 3-6. Paragraph 3: "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." 1. This makes for difficult reading and comprehension. Why is La Jolla Village Drive, the street on the opposite side of the project site from the proposed ROW vacation mentioned here? 3-6. Paragraph 6: "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." 1. How would parking for visiting students be accommodated? 3-8. Paragraph 2: "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." • Please see questions to previous similar statements regarding the nature of the current use of the Cliffridge property. 1. Why are the administrative offices referred to as "religious?" Is there a difference between religious administrative office use and non-religious administrative office use? If so, what is it? 3-8. Paragraph 3: "Expanded operation would occur in Phase 2 with the completion of a permanent religious use facility." 1. Will there also be facilities for other uses? If not, then the inclusion of "religious use" to describe the facility is gratuitous. 1 "Phase 2 would also involve the landscaping of the cul-de-sac and the vacat	1. Would any portion of the proposed structures or their required setbacks overlap the area gained by such a vacation? 2. Could a sidewalk and/or landscaping be constructed without the ROW vacation? Could these be accomplished with a reduced ROW vacation (one that does not reduce the width of La Jolla Scenic Drive North)? 3-6. Paragraph 3: "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 Cenic Drive to improve and enhance the pedestrian environment with a walkway and shade from proposed street trees." 1. This makes for difficult reading and comprehension. Why is La Jolla Village Drive, the street on the opposite side of the project site from the proposed ROW vacation mentioned here? 3-6. Paragraph 6: "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." 1. How would parking for visiting students be accommodated? 3-3. Paragraph 2: "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." Please see questions to previous similar statements regarding the nature of the current use of the Cliffridge property. 3-6. Paragraph 3: "Expanded operation would occur in Phase 2 with the completion of a permanent religious use facility." 1. Will there also be facility." 1. Will there also be facility is gratuitous. Phase 2 would also involve the landscaping of the cui-de-sac and the vacated ROW between the Cliffridge property 1. Confusing. Aren't the cul-de-sac and the vacated ROW between the Cliffridge property

- BZ-42 3-8, Paragraph 5: "If the Phase 1/Phase 2 project is not approved, the applicant seeks approval of the Existing with Improvements option:"
 - 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 "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."
 - 1. How would the use change from the current use?
 - If this option is being put forward as a project, why has the applicant been allowed this use prior to approval, let alone application?
 - 3. What would happen to the vacant lot should this option be approved?
- BZ-44

 3-16. Paragraph 1: "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."
 - 1. Has the applicant been cited for code violations regarding its current, unpermitted use?
 - 2. What are the requirements for "religious use?" Where is such a use described in the San Diego Municipal Code?
 - 3. Is the current site zoned for office use without "religious use?"
 - 4. How would "religious use" impact the surrounding neighborhood differently than office use of a non-religious nature?
- BZ-45 3-16, Paragraph 3: "This does not including the "phantom floor" of the HCJL center (two stories), which is not occupiable space."
 - "including" should be "include"
 - 1. Are the second story balconies counted in the GFA?
- BZ-46 "A new HCJL center, library/chapel, and professional leadership building would comprise the facility."
 - This is confusing. Isn't the project referred to as the HCJL? Are the library/ chapel and professional leadership buildings separate projects?
 - What is the proposed use for the "HCJL center" building? Unlike "library/chapel," the meaning is not clear from the name.
 - 3. What is a "professional leadership building" and its proposed use?
- BZ-47

 3-16, Paragraph 4: "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 UCSD is in session and consist of study groups, classes, lectures, meetings, Hillel professional staff activities, and periodic events."

- BZ-42 See response to comment BZ-7.
- 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.

BZ-46 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.
 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 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. There would not likely be events when UCSD is not in session, although the facility would be open.

- 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?
- BZ-48 "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."
 - Could/would the facility ever be made available to member students for private functions (such as club meetings, parties, etc.)?
 - If so, what recourse might neighbors have of protecting themselves in the event that the facility becomes a hosting/entertainment venue?
- BZ-49 3-19, Paragraph 1: "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."
 - It sounds as some of these activities might not fall within the stated hours of operation (9 a.m. to 10 p.m.) and may conflict with typical peak hours (7 a.m. to 9 a.m., 4 p.m. to 6 p.m.). Could an estimated schedule (along with expected attendance) be provided?
 - 2. What sorts of social gatherings might occur? Examples?
 - 3. Would the facility be made available to any Jewish student groups that are not directly affiliated with the applicant?
 - 4. What is the applicant's relationship with Tritons for Israel? If they are a separate organization, why would they hold meetings at the facility?
 - 5. What about other groups listed on the Hillel of San Diego at UCSD webpage (http://ucsdhillel.org/student-groups/, see Figure 3, below) as "Hillel Student Groups," such as Union of Jewish Students, Jewish Organization for Persian and Americans, Keshet, Alpha Epsilon Pi, or Alpha Epsilon Phi? Would any of them hold meetings at the facility? If so, what might their attendance rates be?
 - The Event Log for Winter 2010 (Traffic Analysis, Appendix E) lists many groups using the Cliffridge property which may or may not be included in the above list. Would these groups continue to use the applicant's facility?
 - 7. How many other Jewish student organizations currently exist at UCSD? Is it possible that any of them might hold meetings at the facility as well? Have their possible attendance rates been measured and accounted for?
 - 8. Would the facility be made available (either hosted or rented) to other student groups of a non-religious nature?
 - Could individuals who are not enrolled at UCSD (whether visiting from another educational institution, Hillel alumni, or simply a visitor seeking a different venue of worship) attend any of the religious activities provided at the facility?
 - 10. How could any use of the facilities by groups outside of Hillel be measured or monitored?
 - 11. How would members of groups outside of Hillel who use the facility be encouraged not to drive to the facility? How might overflow parking be handled?

- BZ-48

 1. The facility would not be available for rent for large-scale private functions, but meetings and gatherings would be accommodated subject to the occupancy limits.
 - 2. Occupancy limits would restrict the number of people allowed at any event.
- BZ-49 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.
 - 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 HCJL 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.

BZ-50



BZ-50 3-19, Paragraph 2: "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."

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.

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.

1. What were the venues in which these activities were held? What limits (if any) on occupancy did they have?

- The current comment period for this EIR is taking place in 2014; 2010 was four years ago. Given that this EIR has been recirculated twice, would it be unreasonable to present updated figures? Perhaps the average number of activities held each year?
- BZ-51 3-19, Paragraph 3: "Total daily "trips" to the HCJL is expected to be approximately 200, inclusive of Hillel staff."
 - Based on this number, and the typical Hillel schedule (listed in the 1st paragraph of this page) averaging 3 activities per day, would it be fair to assume an average attendance per activity of 31?
 - Non-staff ADTs = 200 ADTs (7 staff members x 2 ADTs/member) = 186
 - ADTs per activity = 186 Non-staff ADTs / 3 activities = 62
 - Attendance = 62 ADTs / 2 ADTs/attendee = 31
- BZ-52 "On rare occasion, such as the opening dedication ceremony or a "welcome back" barbeque, attendance at the HCJL could be greater than listed above, but would not be expected to exceed 100 persons at any one time."
 - Would such events be open to visitors who are not students attending UCSD (such as parents and families of graduating seniors, for instance)? If so, how might they be encouraged to walk to the facility?
- BZ-53 3-19, Paragraph 5: "The HCJL 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).
 - In addition to descriptions of the other buildings and their rooms, the two paragraphs tha
 follow this one include the uses to which the buildings will be put. Could such uses be
 listed for this building?
- BZ-54 3-20, Paragraph 3: "The Temporary Parking Plan would provide parking for the existing temporary office use of the Cliffridge property."
 - Is "existing temporary office use" listed here the same as the "religious use" mentioned on page 3-16, paragraph 1?
 - If so, why are they described differently ("office use" is certainly a much clearer and more understandable description)? If not, what are the differences?
- BZ-55 "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."

BZ-51 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 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.

BZ-52 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.
BZ-53 It is unclear what the comment is requesting; however, see EIR Section 3.2.2, which provides details of the project's component parts.
BZ-54 1 & 2. The Existing with Improvements Alternative would entail a facility that would be used primarily for religious purposes. It is not an "office use" as the commenter uses the term.
BZ-55 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.

BZ-55 (cont.)

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.

BZ-56	How was this number calculated? 3-20, Paragraph 4: "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);	BZ-56	See response to comment BZ-135.
	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." • Please refer to my comments regarding Page 4.2-41, Paragraph 3.		
BZ-57	3-23, Paragraph 2: "Landscaping would also include temporary bike path fencing (to be removed once Phase 2 is completed) and development of a new bus stop on La Jolla Village Drive. The Landscape Concept Plan for Phase 1 is shown in Figure 3-9." 1. Given the level of traffic on La Jolla Village Drive, was any consideration given to providing a pop-out for the replaced bus stop?	BZ-57	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."
BZ-58	3-23, Paragraph 5: "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." 1. What is the approximate size of the "park-like amenity?"		There is a "bus only" lane that currently exists at the bus stop; therefore, no bulb out would be required.
BZ-59	"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." 1 Since La Jolla Scenic Drive North is called out as a proposed Class II Bikeway in the La	BZ-58	The project proposes approximately 10,000 square feet of park-like landscaping and amenities. See EIR Chapter 3.
	Jolla Community Plan, wouldn't it make sense (and further the proposed project goal 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" [page 3-1, paragraph 4]) to extend the range of the demarked bike path, and devote a portion of the vacated ROW along the street to properly striped bike lanes, as called for in the City's Bicycle Master Plan?	BZ-59	See the response to comment BZ-11.
BZ-60	3-24, Paragraph 1: "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)." 1. Can a breakdown of each street yard be provided?	BZ-60	Landscaping plans are included within the EIR. Refer specifically to EIR Figures 3-9 through 3-11.
BZ-61	3-24, Paragraph 3: "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	BZ-61	 8 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.

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	 Village Drive and La Jolla Scenic Drive North. Figure 3-14 provides a visual of the screening elements." This suggests that pedestrian access to the facility will be made from both the North and the South. Is this correct? 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? 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 visuals of proposed screening elements from angles other than those away from residential homes? 		
BZ-62	1. Where on the property is this located? 2. Can a rendering/visual be provided to show approximate size and location?	BZ-62	 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. See EIR Figure 3-14, which shows the wall where the sign would
BZ-63	3-41, Paragraph 1: "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."		be located.
	1. How would refuse collection be carried out? Would the collection truck enter the parking area or would dumpsters be rolled out to the street for collection? 2. How often would the residential homes across the street from the parking area, unaccustomed to the noise of institutional refuse collection, be subjected to the din of dumpster gathering?	BZ-63	 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. The truck likely would come once a week, during the day.
BZ-64	 3-41. Paragraph 3: "Phase 2 would entail selective demolition of portions of existing driveways and curbs in order to provide new access in accordance with current regulations." 1. This is an alarming sentence. Which driveways (other than that of the Cliffridge property which, arguably, should be included in Phase I) will be demolished? Do they include any other properties other than the two parcels in question? 	BZ-64	Only demolition of the Cliffridge property driveway and curb would be required. The Final EIR has been clarified.
BZ-65	"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." 1. How many square feet would the Cliffridge property gain through this action? 2. Why is the owner of the Cliffridge property, as a party that stands to materially gain from this action, not included as an applicant?	BZ-65	 The Cliffridge property would not gain any square feet through this action. This comment does not raise any substantive issue related to the adequacy or accuracy of the EIR. No further response is required.
BZ-66	3-41, Paragraph 4: "Construction workers would park off-site and be shuttled to the construction work site." Where would this off-site location be? Would another neighborhood be burdened with construction parking?	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.

3-42, 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-67	This sentence has been revised to remove the reference to Section 3.3.1.3 in the Final EIR.
"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)." • 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 = 1.6125 • 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 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-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).
"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?	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.
	 Section 3.3.1.3 does not make any mention of easements or dedications. "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)." 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 = 1.6125 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 convision 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). "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	Section 3.3.1.3 does not make any mention of easements or dedications. * Section 3.3.1.3 does not make any mention of easements or dedications. * Section 3.3.1.3 does not make any mention of easements or dedications. * 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).* * 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 = 1.6125 • 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 acress 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). * 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.*

BZ-70



- 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 12foot parkway on the north side of the roadway with increased landscaping."
 - 1. What is the required setback on this side of the property?
 - 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?
 - 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 Cliffridge 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 Cliffridge Avenue/La Jolla Scenic Drive North bend (and thereby reducing the bend's acuity) 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."

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.

BZ-71 (cont.)

- 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 parkway 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-tosouthbound 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.
- BZ-72 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-tocurb 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.)
 No elimination of on-street parking along La Jolla Scenic Drive North is proposed. 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. The street would conform to the City's street design manual, which takes into account the movement of public safety vehicles. It is unclear what this comment is referencing. EIR Chapter 8 evaluated potential impacts associated with public services and found no impacts would occur. 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.

RESPONSE

 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?

LETTER



Figure 5

- 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?
- What distance is required for the movement of public safety vehicles (fire trucks, ambulances, et al.)?
- 6. 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."
 - 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?

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.



BZ-74

3-49, Paragraph 4: "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."

- 1. Could Phase 2, as described, be constructed without approval of the ROW vacation?
- Is the City the current owner of the land that would be given up in the ROW vacation?
- Section 3.4.2.1.i 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 \$940,000, would it be fair to determine the approximate value of the area comprising the ROW vacation as approximately \$1,140,781?
 - o \$940,000 x (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?
- 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?
- 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 15,350 sf = 18,191 sf
 - a 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
 - 18.191 sf / 21.278 sf = 0.14507
- I could not find a specific lot size for the Cliffridge property other than the approximate 0.2-acre listed in Section 1.0 and a few other locations in the document. Is such a number provided?

BZ-74 1.

- 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.

BZ-75

- 10. Would it be fair to say that the lot size of the Cliffridge 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 Cliffridge property? (8,712 sf + 3,087 sf) / 8,712 sf = 1,354
- 12. Why is this material gain for the property owner of the Cliffridge 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 properties 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?
- BZ-75

 3-49 Paragraph 5: "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)."
 - According to earlier subsections of Section 3.4.2.1, the Phase 2 facilities would comprise 6,479 square feet GFA. Based on this number wouldn't the proposed lot coverage be approximately 19.3%?
 - 6,479 sf / 33,541 sf = 0.19316
 - 2. How was the 5,291 sf figure derived? Could this be stated more clearly?
 - 3. Does the 5,291 sf cited include the parking lot and other paved improvements? Why or why not?
 - 4. Does Phase 2 meet the maximum paving and hardscape restrictions? Could this figure be included in this section?
- BZ-76

 3-49, Paragraph 6: "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."
 - Please rephrase to indicate that Phase 1/Phase 2 is the actual project and that the Existing with Improvements option is a project alternative.
 - Please indicate that the Existing with Improvements option is also subject to approval
 and that lack of approval for the Phase 1/Phase 2 project would not necessarily result in
 approval of the Existing with Improvements option.
 - How many staff members are projected to use the Cliffridge property under the Existing with Improvements option?
 - The Event Log from Winter 2010 (Traffic Analysis, Appendix E) lists numerous events flagged as "Y" in the column labeled "Hillel House Y or N." Is the Hillel House referred to in this log the same as the Cliffridge property?
 - Would "religious services and programs" proposed under the Existing with Improvements option comprise a similar schedule as found in the Event Log?
 - 4. The Event Log lists many groups other than applicant hosting events at the site. Is this practice projected to continue? If so, how would such uses be monitored for compliance with the applicant's stated goals regarding traffic and parking?
 - 5. What would happen to the Cliffridge property if neither the Phase 1/Phase 2 project nor the Existing with Improvements option (nor any alternative including the Cliffridge property) are approved?

- 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.
- 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 Cliffridge property.
 - 3. Programming at the Cliffridge 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.
 - 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-77 3-50, Paragraph 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."
 - Table 142-05F outlines parking ratios for eating and drinking establishments. Please change the referenced table to Table 142-05G: Parking Ratios for Specified Non-Residential Uses.
 - What is the difference between standard professional office use (not permitted in a residential zone, according the LJSPDO) and offices used primarily for religious purposes (by which the applicant claims the right to use the property)? If the uses and the potential impacts are the same, why is one allowed when the other is not?
 - Previously proposed projects for this site have argued that office use would be considered an accessory use to the primary religious use. If that assertion is correct, why isn't the parking requirement based on religious use instead of office use?
 - 3. The Event Log from Winter 2010 (Traffic Analysis, Appendix E) lists many activities, including some with an attendances as high as 40 (cf. Tritons for Israel [Jan. 6], Jews Around the World (Feb 25]), 45 (cf. Conversation with the BSU [Mar. 11]), or 50 (cf. Inter-Faith Vigil [Mar. 10]). Based on the claimed number of 80% attendees walking to activities, such attendance numbers suggest that as many as 10 cars require parking. Why isn't this figure used in the projected parking requirements? How would the extra four cars be accommodated?
- BZ-78 3-51, Paragraph 1: "Here, a 24-foot-wide driveway and curb cut would be constructed."
 - Is this the curb cut requiring the requested deviation? If so, could this be included here for the sake of clarity?
- BZ-79 "Bicycles would be provided enhanced access to the Phase 2 site from the proposed bike path from Torrey Pines Road/La Jolla Village Drive."
 - 1. Is this "enhanced access" to the Phase 2 facilities themselves or merely referring to bicyclists continued ability to traverse the distance from the Torrey Pines Road/La Jolla Village Drive intersection to the Cliffridge Avenue/La Jolla Scenic Drive North intersection?

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-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.

BZ-80	 3-51, Paragraph 2: "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." 1. Would the existing stop sign be replaced with any other kind of sign? 2. Why are only drivers approaching the curve from La Jolla Scenic Drive North warned of their approach to the turn? 	BZ-80	 A new left/curve sign would be installed. 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	"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." 1. Could the narrower width of La Jolla Scenic Drive North increase the chance of a vehicle veering into oncoming traffic while turning east from Cliffridge Avenue? 2. Could some of the space currently proposed for the 12-foot parkway be used for maintaining a wider street and/or re-aligning the street for safer driving conditions?	BZ-81	1 & 2. See the response to comment BZ-72.
BZ-82	3-51, Paragraph 3: "Pedestrian access to Phase 1/Phase 2 is planned via a non-contiguous sidewalk encompassing the facility." 1. This statement is unclear. Does "the facility" refer to the Cliffridge property or the Phase 2 structures? 2. Does pedestrian access refer to the ability to navigate through and around the property or the ability to enter the premises of the actual structures? 3. Why is the sidewalk described as non-contiguous? Where is it interrupted?	BZ-82	 The sentence is referring to the Phase 2 facilities. The sentence is referring to the ability to enter the premises of the structure. The sidewalks around the Phase 2 site would be contiguous.
BZ-83	"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." 1. Does this mean that the central courtyard will be accessible from these directions or merely that pedestrians will be able to utilize the propose bike path to navigate between the Torrey Pines Road/La Jolla Village Drive intersection and the Cliffridge Avenue/La Jolla Scenic Drive North intersection?	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	 3-55, Paragraph 3: "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." Reports to the San Diego Planning Commission and the San Diego City Council for previously proposed projects on this site indicated that Site 653 was not designated for residential use until the La Jolla Community Plan was amended in 2004 [Planning Commission Report No. PC-05-004, Report to City Council No. 05-193]. Prior to this, Site 653 was designated open space. 	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	"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	BZ-85	 See the response to comment BZ-4. This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.

	pursue its religious purposes and mission while development of a permanent space was considered." 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 Cliffridge property? 3. Would the private nonprofit foundation retain ownership of the Cliffridge 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 Cliffridge property should the Existing with Improvements option be approved? 6. What is the name of the private nonprofit foundation? Why is not included anywhere in the environmental document?		
BZ-86	3-55, 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. • This project was referred to as "Hillel of San Diego - Project 6068" and described the project as "a two-level student center for religious purposes."	BZ-86	The information cited on page 3-55 of the EIR provides a clear background of the project. No revision to the EIR is required as a result of this comment.
BZ-87	 "Site 653, along with the vacated ROW, was sold by the City to Hillel in 2006 pursuant to City Council Resolution R-301433." In 2006, the City Council passed R-301432 which approved the PDP and SDP for Project 6068, certified the MND, and approved the ROW vacation. R-301433 was passed in the same Council session, selling Site 653 and the vacated ROW (comprising 15,341 sf and 17,923 sf, respectively, and identified as APN 433-120-26). These actions were the actions that were challenged in court (see below). 	BZ-87	This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.
BZ-88	"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 only project approved by the City was Project 6068 in 2006. No permits were ever approved in 2008. In 2008, Project 149437, "Hillel of San Diego Student Center," was brought before the City Council. This project was substantially the same as Project 6068, with the addition of environmental design elements designed to attain LEED Silver certification. This process followed the Superior Court ruling regarding Project 6068 and occurred while Project 6068 was being heard by the Court of Appeals (and prior to the Court's 2009 ruling). This project also included Project 6068's proposed ROW vacation since the Superior Court's ruling overturned all project approvals. Hence, while the sale of the property was upheld, it was the original parcel only—not the parcel and the vacated ROW. The City Council returned this item to the Mayor's office following the determination that the Project had not met all Noticing requirements.	BZ-88	This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.

BZ-89	"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 MND challenged by the project opponents was Project 6068, approved by the City in 2008. • The ruling also reversed the approval of the ROW vacation.	BZ-89	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.
BZ-90	"The project opponents also challenged the sale and the transfer of the property to Hillel, which were upheld by the Court of Appeals." • The sale and transfer of property only included the original 15,341-square-foot parcel. It did not include the ROW vacation approved with Project 6068 since the project approvals were overturned.	BZ-90	This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.
BZ-91	3-56. Paragraph 1: "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." • Please change "project" to "projects" to reflect both Project 6068 and Project 149437. "The majority of the environmental concerns raised had to do with aesthetics, parking, and public nulsances such as light/glare and noise."	BZ-91	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.
	1. What about traffic?		
BZ-92	3-57. Paragraph 1: "Redesign of the Phase 1/Phase 2 project such that it no longer includes an underground parking garage or a curb cut deviation." Doesn't the Phase 1/Phase 2 project require a curb cut deviation for the temporary parking area for Phase 1?	BZ-92	The prior project required a permanent curb cut deviation, whereas the current Phase 1/Phase 2 project requires a temporary curb cut deviation.
BZ-93	3-57. Paragraph 2: "Phase 1/Phase 2 has been designed 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." Please note that this change/redesign differs only from Project 6068; Project 149437 included this feature.	BZ-93	This comment does not raise any substantive issues related to the adequacy or accuracy of the EIR. No further response is required.
BZ-94	4.1-1, Paragraph 2: "The project site contains the Cliffridge property that currently serves as the Hillel office. The remainder of the site is currently vacant." • This suggests that the project site comprises one contiguous parcel. Please include information to reflect that the project site comprises two individual parcels.	BZ-94	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.

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-95	This sentence is accurate relative to the project site. No revision to the EIR is required as a result of this comment.
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	BZ-96	This sentence has been clarified in the Final EIR.
	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 (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."	BZ-97	See the response to comment BZ-23.
	 As noted above, the on-line, publicly available version of this document, located at http://www.sandiego.gov/planning/gemplan/pdf/generalptan/lu/ggovstreet.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."	BZ-98	This sentence is accurate relative to the project site. No revision to the EIR is required as a result of this comment.
	 It would be more correct to say that the project site is "bordered" rather than "surrounded." 		
BZ-99	4.1-9, 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."	EZ-99	See the response to comment BZ-55.
	 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. 		
D7 400	4.1-10. Paragraph 2: "The parking area would be shielded from view along Torrey Pines Road	EZ-100	From where the cars will be parked, it is approximately 10 feet
BZ-100	by existing walls and from the adjacent single-family residence by landscaping."	LZ-100	away from the property line. From where the turnaround area is located, it would be approximately 3 feet away.
	What is the distance from the parking area to the southern property line?		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).

- 2. What is the distance between the structure of the single-family residence to the south and the property line between the two properties?
- Is a landscape plan for the Existing with Improvements option available? If so, please include a reference here; if not, why not?
- 4. What sort of landscaping will be used to "shield" the adjacent property to the south?
- BZ-101 4.1-13, 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."
 - 1. Which side of the property would be considered to be the "front" side?
 - 2. What would be the street address of the Phase 2 buildings?
- BZ-102

 4.1-17, 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."
 - 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?
 - 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 LJSPDO or SDMC.
 - · Please refer to my comments regarding Page 4.2-41, Paragraph 3.
- BZ-103

 4.1-18, Paragraph 3: 'The Design Manual states "design all curves, intersections and cul-desacs 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.'
 - 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?
- BZ-104

 4.1-18, 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."
 - 1. Which elements of each sign comply/do not comply with the sign component of the
 - 2. What would be the copy on each sign?
 - 3. What is the size of the wall sign near the facility's entrance?
 - 4. The description "a ground sign integrated with the retaining wall" is confusing. Would this be considered a ground sign or a wall sign?
 - 5. What is the size of the "ground" sign?
 - 6. Would the "ground" sign be illuminated in any way? If so, how?

- BZ-101 1. The front of the project would be La Jolla Village Drive.
 - A street address would be provided at subsequent permitting actions.
- BZ-102 With respect to parking numbers, see response to comment BZ-55.
- BZ-103 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.
- BZ-104 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.
 - 2. The signs are currently anticipated to say the lead donor's name, followed by "Hillel Center for Jewish Life."
 - 3. The wall is approximately 20 feet long. See EIR Figure 3-4.
 - 4. This would be a ground sign mounted on a wall.
 - 5 & 7. The sign has not been fully designed; however, it would comply with applicable regulations.
 - 6. The sign may be slightly illuminated by low-wattage spotlights in order to indicate to visitors where the entrance to the facility is.
 - 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.

	 SDMC 142.1265 does not include "ground sign" as a permitted permanent sign for Single Dwelling Unit Residential Zones. In what way would the proposed "ground" sign comply with the LDC? SDMC 142.1265 does not include language permitting permanent signs on multiple street frontages. Why is it allowed here? 		
BZ-105	4.1-18, Paragraph 5: "Overall, Phase 1/Phase 2 would comply with the multiple components of the La Jolla Shores Design Manual." • While it may be fair to say that it complies with many components, it is not proper to say it complies with "the multiple components of the La Jolla Shores Design Manual" since the LJSDM suggests long curves over short sharp curves for streets and does not discuss permanent ground signs in residential areas.	BZ-105	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.
BZ-106	4.1-19, Paragraph 1; "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." • This wording is somewhat awkward, as the reader must parse the words "to the north of the project" and "and to the north of it" in the same sentence, perhaps leading to confusion regarding exactly what lies directly north of the project site. Perhaps something like, "To the north, separated by the six-lane La Jolla Village Drive, lie the La Jolla Playhouses and UCSD Campus."	BZ-106	This sentence is accurate relative to the project site. No revision to the EIR is required as a result of this comment.
BZ-107	4.1-20, Paragraph 2* "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." • Specifically, the LSPDO lists "Churches, temples or buildings of a permanent nature, used primarily for religious purposes" as being allowed in the residential zone. • Please refer to comments made for Page 3-50, Paragraph 2.	BZ-107	See response to comment BZ-55.
BZ-108	4.1-20, Paragraph 4: "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." This statement cannot be made unless questions regarding street alignment, off-street parking, and signage are properly addressed.	BZ-108	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 referenced documents.
BZ-109	4.2-1, Paragraph 1: "The following traffic discussion is summarized from the Traffic Impact Analysis prepared by Linscott, Law & Greenspan Engineers (LLG)." • Please include the date this analysis was generated to avoid confusion with the analysis used for the previous draft of the EIR.	BZ-109	The Traffic Impact Analysis was updated in 2013.

4.2-3, Paragraph 4: "Traffic volumes are based on daily roadway traffic counts conducted in BZ-110 February 2010 for the study area while UCSD and public schools were in session." New traffic counts have been provided to staff and no revisions to BZ-110 the TIA or Final EIR are required. 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 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" BZ-111 The City's Bicycle Master Plan Update was adopted in December 1. Why is there no discussion regarding the City's 2013 Master Bicycle Plan? 2013, which is when the recirculated EIR was released for public review. Therefore, the EIR could not have included this information. BZ-112 4.2-7, Paragraph 8: "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 The project would not conflict with implementation of the bicycle 1/Phase 2 or the Existing with Improvements option)." routes identified in the Bicycle Master Plan Update. As previously detailed, the Update did not identify the portion of La Jolla Scenic 1. Which of the routes listed stop at the project site? Drive North (on the southern perimeter of the project site) as a BZ-113 bikeway. However, the proposed project would enhance bicycle 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 9:00 A.M. to 8:00 P.M. Frequencies of connectivity by providing a pathway from the intersection of North pick-ups vary by the hour of the day, and range between 10 minutes to 20 minutes. The UCSD Torrey Pines Road and La Jolla Village Drive. 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." BZ-112 Route 30 stops at the bus stop adjacent to the project site. 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? BZ-113 1. The Campus Shuttle does not stop at the bus stop adjacent to Would passengers have a direct walk to the site from the shuttle stop or would they be required to cross major intersections? the project site. 2. The nearest Campus Shuttle Stop is located at Expedition Way 4.2-8, Paragraph 2: "In addition, shuttle service is provided to connect the University Town and North Torrey Pines Road (approximately 750 feet west of BZ-114 Center (UTC) Transit Center to UCSD via the Metropolitan Transit System SuperLoop on the project site). The passengers would have to cross two 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)." intersections to arrive at the project site. 1. Does the SuperLoop stop at the project site? BZ-114 1 & 2. The nearest SuperLoop stop is located at Gilman Drive and 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 Myers Drive, an approximate 15-minute walk from the project required to cross major intersections? 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."

- 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?
- 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 for the proposed project the argument could be made that each contains elements of that do match the listed planned activities. Considering this, why was the "similar-use" rule discarded in favor of a site-specific study?

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 do 115 students represent?
 - 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-115 1-3. See response to comment BZ-51.

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 even 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?
- 5. 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 fullyengaged?
- 7. Over-sampling can occur when the identity of respondents cannot be verified as unique. What measures were taken to limit or reduce the incidents 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?
- BZ-119 "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."
 - In reviewing the data presented in Appendix G1 of the Traffic Analysis, it appears that
 the survey question related to likely methods to attend the facility is Question 7. Is this
 correct?
 - 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?
 - 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 9 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 + 39 + 9)) / (183 + 162) = 0.724
- 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 undefinable number of parameters (weather, personal schedule, convenience, et al.), thus making it impossible to determine with any certainty how often a respondent would select one mode over another?

BZ-119 1-13. See the response to comment BZ-118.

- 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 (13%) would take the campus shuttle and walk to the facility during the evening
 - 36 students / 115 students = 0.313
 - As many as 60 students (52%) would walk to the facility during the day
 - 60 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 straight-forward 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)?

BZ-120	(48 drivers + 27 Q3 potential drivers - 2 Q5 non-response - 43 permit holders) (48 drivers + 27 potential drivers - 2 Q5 non-response) = 0.411 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? "Of the 20 percent that suggested they would drive to the facility, just over half of those students responded that they would carpool."	BZ-120	See response to comment BZ-118.
	 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 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." 1. What was the total membership of the UCLA Hillel at the time the survey was taken? 2. What percentage of the total UCLA Hillel membership do the samples represent? 3. 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-121	1-3. See response to comment BZ-118.
BZ-122	 "Of the students driving to the site, 100 percent of those trips were carpool trips." The Transportation Questionnaire (Traffic Analysis, Appendix G2) for the "Chairm 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? 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-122	1-2. See response to comment BZ-118.
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." 1. 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-123	See response to comment BZ-118.
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."	BZ-124	See response to comment BZ-118.

	 A survey of the area through Google Streetview shows that the majority of properties surrounding the UCSB Hillel 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 Hillel program would draw between 10 and 30 students and, at most, 50 patrons to the site,"	BZ-125	The programming would be the same as described in the EIR. See response to comment BZ-50.
	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."	BZ-126	See response to comment BZ-51.
	1. The Event Log for Winter 2010 does not contain times, while the calendar sheets show an average of 6-7 activities for 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."	BZ-127	See response to comment BZ-51.
	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. 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."	BZ-128	See response to comment BZ-118.
	 See comments for Page 4.2-10, Paragraph 2 regarding the flawed analysis of the data collected by the UCSD survey. This number appears to be an average of the percentages claimed to be reported by the student surveys conducted at UCSD (80%), UCLA (93%), and UCSB (84%). Is this correct? (80 + 93 + 84) / 3 = 86.6 Given that transportation patterns depend on many factors besides similarity of programming (e.g. terrain, availability, cost, and proximity of housing, availability and 		

	convenience of public transit, availability of on-street parking, campus culture, et al.) and that these factors vary among even the most similar of facilities, why are the surveys from UCLA and UCSB given weight equal to that of the very facility that is being proposed?		
BZ-129	4.2-12, Paragraph 1: "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."	BZ-129	Please see responses to comments BZ-55 and BZ-115.
	 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."	BZ-130	Please see responses to comments BZ-55 and BZ-115.
	 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?	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.
	What are the details of this contact (date, resulting outcome of any meetings, et al.)? How can one private development project impose a condition on the private property of a nearby, non-adjacent parcel of land? What effect would failure to meet this condition to have on the Traffic Analysis and the project as a whole?		The analysis assumes all 128 homes utilize Caminito Deseo to reach La Jolla Scenic Drive North.
BZ-132	4.2-16. 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)."	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
	 Given the remaining portion of the project approval process and that construction is estimated to take approximately 12-18 months, is an opening day in 2015 realistic? If not, why hasn't the timeframe for near-term cumulative project impacts been adjusted accordingly? 		for any unanticipated growth.
BZ-133	"Development projects in the nearby area were included in the near-term traffic volume forecast:"	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.
		1	

- Enrollment at Torrey Pines Elementary School increased by approximately 15% between the school year 2012-2013 and School Year 2013-2014 and may continue to rise due to expanded classroom space. Has the increased traffic from this growth been accounted for?
- BZ-134 4.2-21, Paragraph 4: "Venter Institute is located at the southwest corner of the intersection of La Jolia Village Drive and Torrey Pines Road as part of the UCSD campus."
 - Please consider that the UCSD LRDP 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?
 - 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 "Hillel House Y or N." Is the Hillel 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? Why or why not?
 - 6. SDMC 142.0530 (f) says, "Unspecified Uses. For uses not addressed by Tables 142-05E, 142-05F, and 142-05G the required off-street parking spaces are the same as that required for similar uses." Further, LJSPDO 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 "resembling 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?
 - A brief glance through SDMC Table 142-05G "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

BZ-134 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.

- BZ-135 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 142.0560 (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?

"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)."

BZ-136

- 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?
- Section 3.1 of this recirculated draft of the EIR indicates that "Hillel would implement its religious mission to foster Hewish 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 "Under such circumstances, the City and industry standard is to estimate parking demand based on information for existing comparable facilities."

 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? BZ-136 1-5. See responses to comments BZ-44 and BZ-55.

BZ-137 1-5. Parking regulations apply to the project. It is not exempt. See response to comment BZ-55.

- If the project site is not exempt, does the wording above make it clear that the parking regulations contained in the SDMC apply?
- Are the SDMC 142,0530 (f) and LJSPDO 1510,0304 (f) (2) considered parking regulations contained in the San Diego Municipal Code?
- 4. SDMC 142.0530 (f) specifies calculation of off-street parking requirement based on similar uses, not "existing comparable facilities," Is there a section of the SDMC that says otherwise?
- 5. What qualities are used to determine whether a facility should be considered comparable? What specific thresholds are required to meet this standard? Where are they defined in the San Diego Municipal Code?
- BZ-138

 4.2-41, Paragraph 4: "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."
 - See comments for Page 4.2-10, Paragraph 2 regarding the flawed analysis of the data collected by the UCSD survey.

BZ-139 Recirculated Draft EIR

- 1. The summary of revisions (Page P-1) states that one of the recirculated draft EIR (rdEiR) includes "further clarification of the Phase 1/Phase 2 project (such as the size of the street vacation, street dedication, easements, and lot coverage)." However, even a cursory review makes it evident that many changes were incorporated into the text. Why was a strikeout copy of the draft not made available to the public?
- 2. It appears that great lengths have been taken in the rdEIR to reduce or omit any references to a student center, administrative offices, or other uses which prior versions of the draft EIR had contained. How do these changes clarify the Phase 1/Phase 2 project with regard to project details?
- 3. While it could be argued that some attempts to provide clarification are a justifiable result of questions posed in response to earlier drafts, it appears that some of the "clarification" is actually an effort to counter arguments made against the project. Why was this information included without the inclusion of the comments provided during the prior public review period?
- 4. Considering the many changes that were included in the text of the rdEIR, why should the recirculation of the EIR not be considered an attempt to proof read the document through crowdsourcing?
- 5. CEQA 21166, in the context of subsequent or supplemental EIRs, defines New Information as that "which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available." Would it be reasonable to apply a similar definition (i.e. information which was not known and could not have been known at the time the environmental impact was prepared or accepted as complete by the lead agency) to a recirculated EIR? Why or why not?
- 6. The summary of revisions (P-1) states that "Planned development projects within the vicinity of the project site have been added to Chapter 7, Cumulative Impacts." This appears to comprise 12 projects that were not included in earlier drafts of the EIR. Of these 12 additional projects, only one (the La Jolla Building) was not already approved at the time of prior drafts of the EIR and, thus, would have been known at the time. Why should these projects be considered "new" information?

BZ-138 See response to comment BZ-51.

BZ-139

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.
- 4. 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.
- Regulations pertaining to supplemental or subsequent EIRs are not relevant to this document.

- 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 rdEIR 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?
- While the rdEIR 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 of producing a new biological survey? What significant new information came to light to prompt this?

BZ-140 Review Timeframe

- 1. The current recirculated draft of the EIR was released for public review approximately a year after the last draft was recirculated. In turn, this has made some of the information used to support the project less current. What requirements, if any, are there in CEQA regarding the timeliness of information or supporting reports? Is it enough to change a few figures and slap on a new date?
- 2. On what date did the City accept and deem complete the application for the project?
- 3. CEQA 15108 states, "With a private project, the Lead Agency shall complete and certify the final EIR as provided in Section 15090 within one year after the date when the Lead Agency accepted the application as complete. Lead Agency procedures may provide that the one-year time limit may be extended once for a period of not more than 90 days upon consent of the Lead Agency and the applicant." Using the date that the original draft EIR was circulated for public review (October 31, 2012—in absence of the acceptance date), would not the time limit for this EIR have expired on January 29, 2014? Why or why not?

BZ-139 (cont.)

- 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.
- 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.

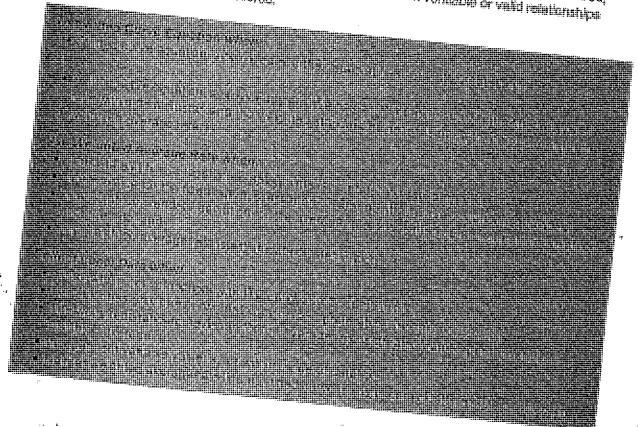
ATTACHMENT 1 ITE Flow Chart

APPENDIX A ITE TRIP GENERATION HANDBOOK EXCERPTS

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 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 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, applicable to the site being considered.



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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 R² 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.

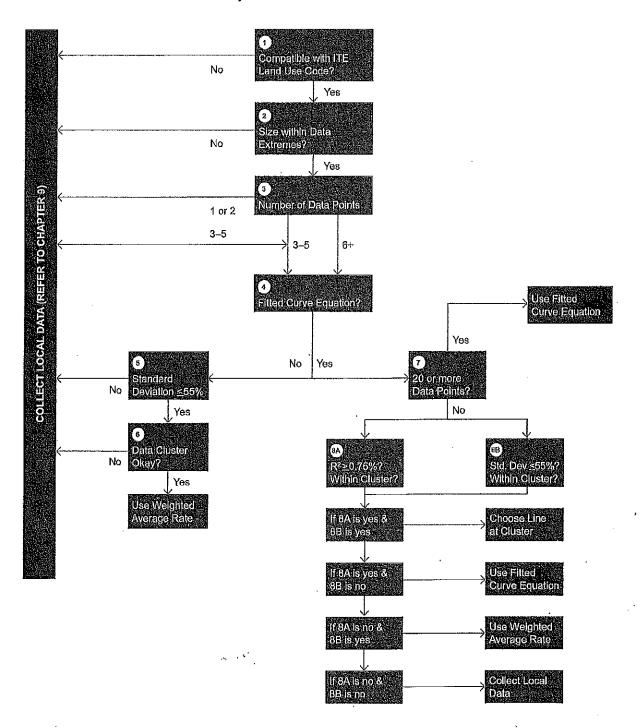
A detailed step-by-step approach for using *Trip Generation Manual* data is presented in Section 4.4 of this chapter.

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



- **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



1

3

200 21

Za 28

7

11

, fi

6

ATTACHMENT 2 Near-Term Intersection Operations

ATTACHMENT 2 **NEAR-TERM INTERSECTION OPERATIONS**

Intersection		Control Type	Peak Hour	Cumulative Flojects		Existing + Cumulative Projects+ Project (100% Drive)		Δ Delay ^c	Impact Type
				Delay ^a	LOS b	Delay	LOS		
1.	La Jolla Village Drive/ Torrey Pines Road	Signal	PM	45.8	D	46.8	D	1.0	None
2.	La Jolla Village Drive/ La Jolla Scenic Way	Signal	PM	24.4	С	26.2	С	1.8	None
3.	La Jolla Scenic Drive North/ Cliffridge Way	OWSC d	PM	8.6	A	8.6	A	0.0	None
4.	La Jolla Scenic Way/ La Jolla Scenic Drive North	OWSC	PM	12.7	В	13.1	В	0.4	None
5.	La Jolla Scenic Drive North/ Caminito Deseo	Uncontrolled ^e	PM	13.1	В	13.7	В	0.6	None

Footnotes:

- Average delay expressed in seconds per vehicle. Level of Service. a.
- b.
- d.
- Increase in delay due to project.

 OWSC One-Way Stop Controlled intersection. Minor street delay reported.

 This intersection is currently uncontrolled. However, Caminito Deseo was analyzed as the minor street stop-controlled movement since vehicles utilizing this movement were observed

SIGNALIZE	ED	UNSIGNALIZ	ZED
DELAY/LOS THRE	ESHOLDS	DELAY/LOS THRI	ESHOLDS
Delay	LOS	Delay	LOS
$0.0 \le 10.0$	A	$0.0 \le 10.0$	A
10.1 to 20.0	В	10.1 to 15.0	В
20.1 to 35.0	C	15.1 to 25.0	C
35.1 to 55.0	D	25.1 to 35.0	D
55.1 to 80.0	E	35.1 to 50.0	E
≥ 80.1	F	≥ 50.1	F

Final
Environmental Impact Report
for Hillel Center for
Jewish Life Project
Project Number 212995
SCH Number 2010101030

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H:	Water Quality Technical Report

H: Water Quality Technical Report
I: <u>Drainage Study Preliminary Hydrology Study</u>

Acronyms

AB Assembly Bill

ADA Americans with Disabilities Act
ADD Assistant Deputy Director

ADT average daily trips

APN Assessor's Parcel Number

ASBS Area of Special Biological Significance

BAU business as usual BI Building Inspector

BMP best management practices

BMPS Bicycle and Pedestrian Master Planning Study

CAFE Corporate Average Fuel Economy

CALGreen California Green Building Standards Code

CalRecycle California Department of Resources Recycling and Recovery

Caltrans California Department of Transportation

CAP Climate Action Plan

CAPCOA California Air Pollution Control Officers Association

CARB California Air Resources Board
CBC California Building Code
CCAP Climate Change Action Plan

CCAP Climate Change Action Plan CCP Cities for Climate Protection

CDFW California Department of Fish and Wildlife

CEC California Energy Commission
CEQA California Environmental Quality Act

CH₄ methane

CIP Capital Improvements Project

CM Construction Manager

CNDDB California Natural Diversity Database
CNEL community noise equivalent level
CNPS California Native Plant Society

CO₂ carbon dioxide

CPA Community Plan Amendment CPAP Climate Protection Action Plan

CPUC California Public Utilities Commission
CRHR California Register of Historic Resources
CSUN California State University Northridge

CSVR Consultant Site Visit Record

CTRI Clinical and Technical Research Institute

cy cubic yards

dB(A) A-weighted average decibel level
DIF Development Impacts Fee
DMA Drainage Management Area
DOE U.S. Department of Energy

DOT U.S. Department of Transportation
DSD Development Services Department
EAS Environmental Analysis Section

ED environmental designee

EIA U.S. Energy Information Administration

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 MMTCO₂E million metric tons of carbon dioxide equivalent

mph miles per hour

MSCP Multiple Species Conservation Program

MW megawatt

MWh megawatts per hour

N₂O 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

PM₁₀ particulate matter less than ten microns in diameter

PME Paleontological Monitoring Exhibit

RE Resident Engineer

ROW right-of-way

RTP Regional Transportation Plan

RWQCB Regional Water Quality Control Board SANDAG San Diego Association of Governments

SCIC South Coast Information Center

SCST Southern California Soil & Testing, Inc. SDAPCD San Diego Air Pollution Control District

SDG&E San Diego Gas & Electric
SDP site development permit
STC sound transmission class

SUSMP Standard Urban Storm Water Mitigation Plan SWITRS Statewide Integrated Traffic Records System

SWPPP Storm Water Pollution Prevention Plan

SWRAC Storm Water Requirements Applicability Checklist

SWRCB State Water Resources Control Board

TIA Traffic Impact Analysis

UCLA University of California Los Angeles
UCSB University of California Santa Barbara
UCSD University of California San Diego
UNEP United Nations Environment Program

UNFCCC United Nations Framework Convention on Climate Change

USFWS
U.S. Fish and Wildlife Service
USGBC
U.S. Green Building Council
USGS
U.S. Geological Survey
UTC
University Town Center
V/C
volume to capacity
VMT
vehicle miles traveled
WMP
Waste Management Plan

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 (LJSPD) 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, communitybuilding, 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 PHASE 1/PHASE 2 GROSS FLOOR AREA

	Proposed Gross Floor Area
HCJL Center (two stories) (including Phantom Floor*)	4,287 sf
Library/Chapel	984 sf
Professional Leadership Building	1,813 sf
Total Gross Floor Area with Phantom Floor	7,084 sf
Total Gross Floor Area without Phantom Floor	6,479 sf

sf = square feet

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

^{*}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.

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 nearbyand 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, tThe alternatives 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

<u>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</u>

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, nNo 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—Alternative would incrementally reduce the Phase 1/Phase 2 project's less-than-significant impacts related to biology, energy, global climate change, hydrology, water qualitynoise, 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 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 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 Alternative require mitigation to reduce impacts to a less than significant level.

Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Interior Noise – 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.	NOS-1: 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. NOS-2: The design for the proposed buildings shall include a ventilation or	Less than Significant
	Interior Noise – 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	Interior Noise – 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. NOS-1: 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.

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
BIOLOGICAL RES 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 California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service?	Cooper's hawk (Accipiter cooperii) 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.	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 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.	Less than Significant

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
PALEONTOLOGIC			
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?	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.	 PALEO-1: The project shall follow the procedures outlined below as a condition of approval for Phase 1/Phase 2. I. Prior to Permit Issuance A. Entitlements Plan Check 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 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. 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. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the 	Less than Significant.
		monitoring program. II. Prior to Start of Construction	
		A. Verification of Records Search	
		The PI shall provide verification to MMC that a site specific records search has been completed. Verification includes, but	

Environmental Issue	Results of Impact Analysis			Mitigation	Impact Leve After Mitigation
issue	Results of Impact Arialysis			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.	Wittigation
			2.	The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.	
		B.	ΡI	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).	

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		When Monitoring Will Occur	
		 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.	

Environmental Issue	Results of Impact Analysis			Mitigation	Impact Leve After Mitigation
			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.	
	Е	3.	Disc	covery 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).	Det	ermination 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.	

Environmental Issue	Results of Impact Analysis				Mitigation	Impact Lev After Mitigatior
		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.		
			(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. Nig	ght an	nd/c	or Weekend Work	
		A.	If nig	ght a	and/or weekend work is included in the contract:	
			ı	рас	en night and/or weekend work is included in the contract ckage, the extent and timing shall be presented and cussed at the Preconstruction Meeting.	
			2.		The following procedures shall be followed.	
			á	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.	
			ŀ	b.	Discoveries	
					All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction.	

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Leve After Mitigation
10000		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:	
		 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	
		 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. 	
		 For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report. 	

Environmental Issue	Results of Impact Analysis			Mitigation	Impact Leve After Mitigation
			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.	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.	
		В.	На	ndling 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.	

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification	
		 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. 	
		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)	
		 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. 	

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
EXISTING WITH IMPRO	OVEMENTS OPTION		
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?	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.	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.	Less than Significant
		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.	

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

<u>deviation from parking requirements</u>. 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 (*Pinus* sp.) exist at the far west end of the undeveloped lot. A large palm (*Chamaerops humilis*) and a eucalyptus (*Eucalyptus* 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 (*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

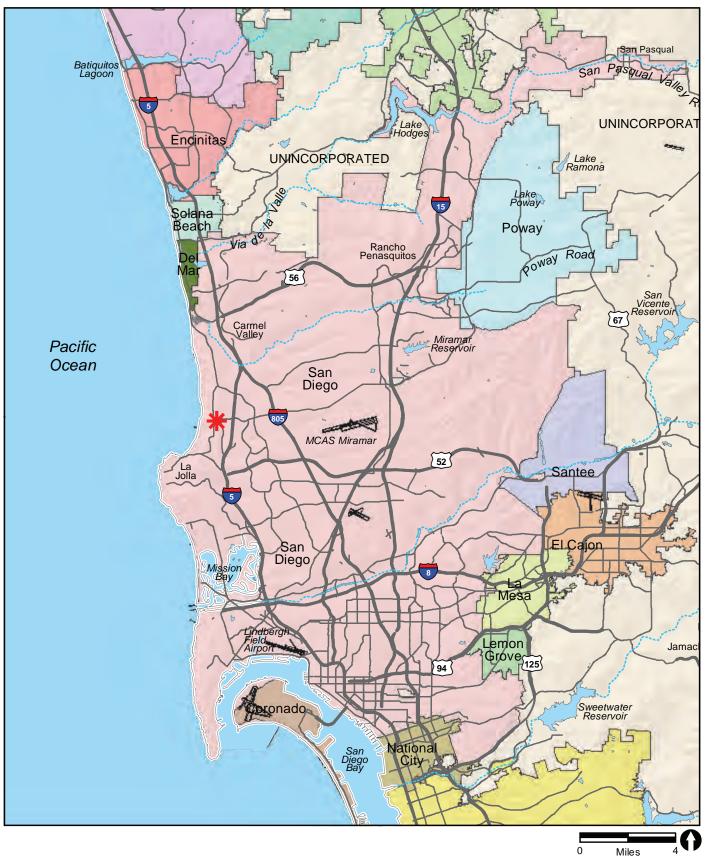
The project site is within one of several areas citywide that are subject to the regulations of the Parking Impact Overlay Zone (Municipal Code Section 132.0801 et. seq.). The off-street parking regulations are increased in designated areas of the City, including campus areas, due to the high parking demand.

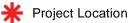
2.5.5 Multiple Species Conservation Program

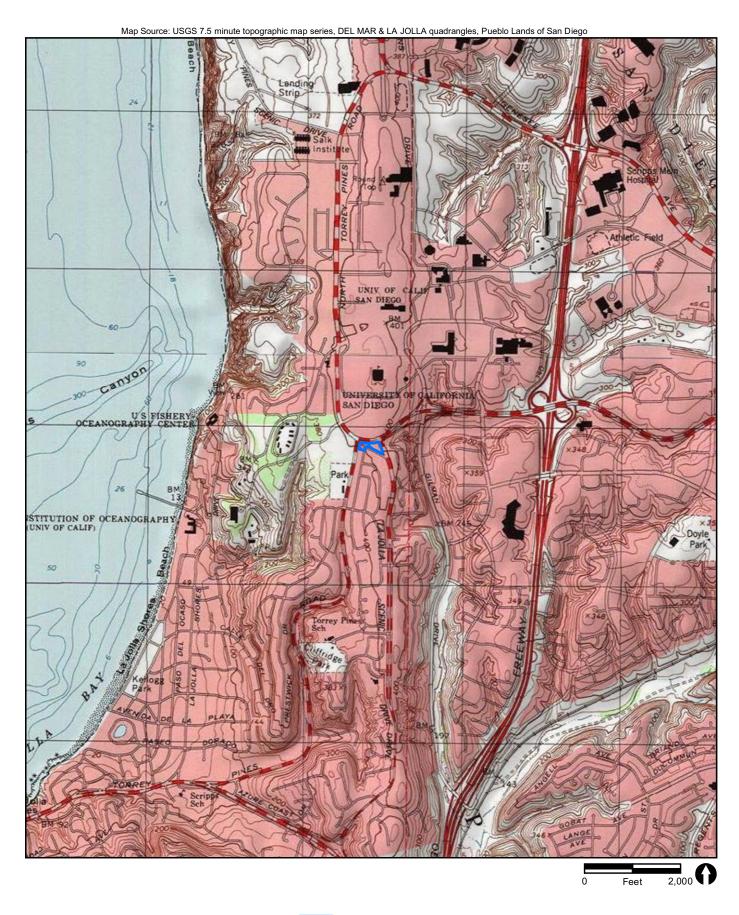
The Multiple Species Conservation Program (MSCP) is a comprehensive, long-term habitat conservation planning program that covers approximately 900 square miles in southwestern San Diego County under the federal and state Endangered Species Acts and state Natural Communities Conservation Planning (NCCP) 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.

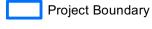
2.5.5.1 Multi-Habitat Planning Area

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.









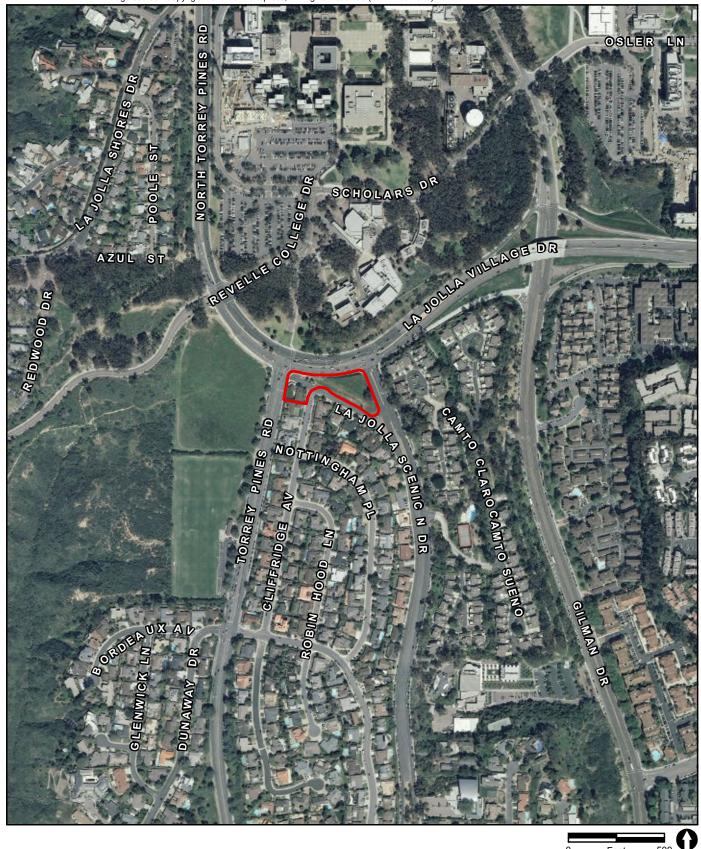




FIGURE 2-3



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, communitybuilding, 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, onsite 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 Centerproposed 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:
 - and a <u>D</u>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 <u>27 parking spaces</u>.

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 HCJLfacility. 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.

<u>In addition to the proposed building construction,</u> Phase 2 would also <u>involve_include</u> the landscaping of the <u>cul-de-sac</u> and the vacated ROW between the Cliffridge property currently occupied by Hillel and the vacant parcel. Landscaping would be provided tand throughout the permanent HCJLproject <u>site</u> 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.

3.4.1.2 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-one counseling, and administrative offices—for Jewish students attending UCSD.

TABLE 3-1 PHASE 1/PHASE 2 GROSS FLOOR AREA

	Proposed Gross Floor Area
HCJL Center (including Phantom Floor*)	4,287 sf
Library/Chapel	984 sf
Professional Leadership Building	1,813 sf
Total Gross Floor Area with Phantom Floor	7,084 sf
Total Gross Floor Area without Phantom Floor	6,479 sf

sf = square feet

TABLE 3-2
PHASE 1/PHASE 2 PARKING AREA SUMMARY

	Proposed Parking Spaces
Temporary Parking	5 Standard spaces
(Phase 1)	1 Van accessible space
	2 Motorcycle spaces
	4 Bicycle spaces
Permanent Parking	25 Standard spaces
(Phase 2)	1 Accessible space
	1 Van accessible space
	2 Motorcycle spaces
	4 Bicycle spaces

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.

^{*}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.

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. <u>During construction of the new facility</u>, Phase 1 would consist of <u>the continued use of the residentialthis</u> structure as a temporary <u>administrative</u> space for Hillel <u>staff-activities</u> 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 including include the "phantom floor" of the two story central HCJL center building (two stories), 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 "[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 (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.

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 court yard/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 IL and scaping 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 2Final 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 efdemolish a 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 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 2Upon 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 2As 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 plannedwould be via through 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 DrivePedestrians 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 <u>be consistent with optimize energy performance by exceeding the current building code/2008</u>—Title 24 energy efficiency standards. <u>by 17.5 percent.</u> 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 onsite 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 CO₂ 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.

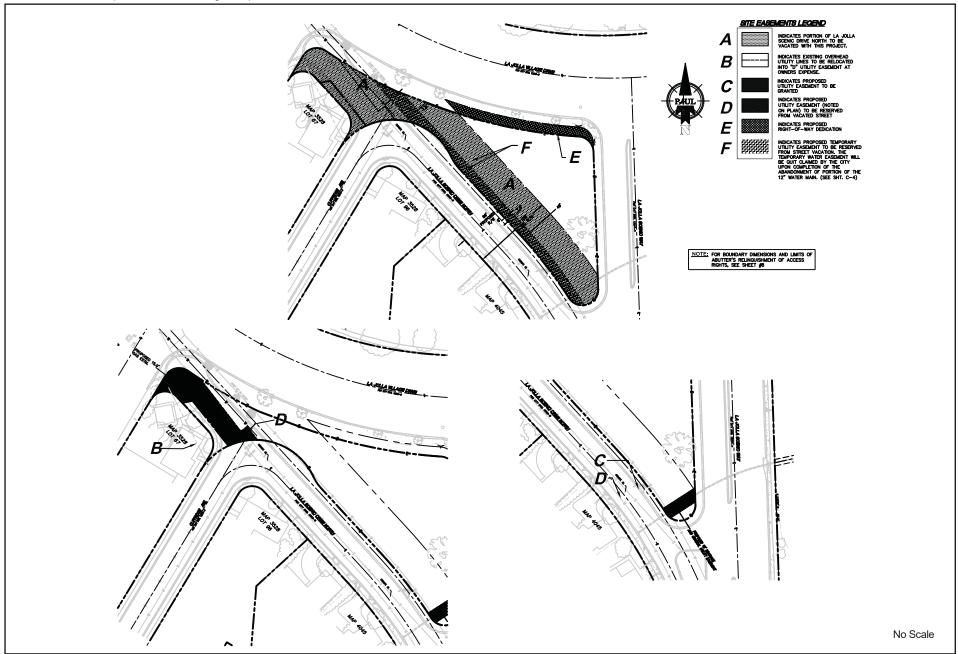
3.6.2 Phase 1/Phase 2 Project Changes

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 2the 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 tThe 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<u>current</u> 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 ly 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 <u>redesigned</u> 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.

- Redesign of the Phase 1/Phase 2The current design of the project such that it no longer includes an underground parking garage or a curb cut deviation.
- <u>Phase 1/Phase 2 has been The current redesigned project to meets</u> 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.



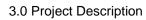


Figure 3-2 has been moved to Chapter 9.0 and is now shown as Figure 9-1.





FIGURE 3-3
Phase 1/Phase 2 Boundaries

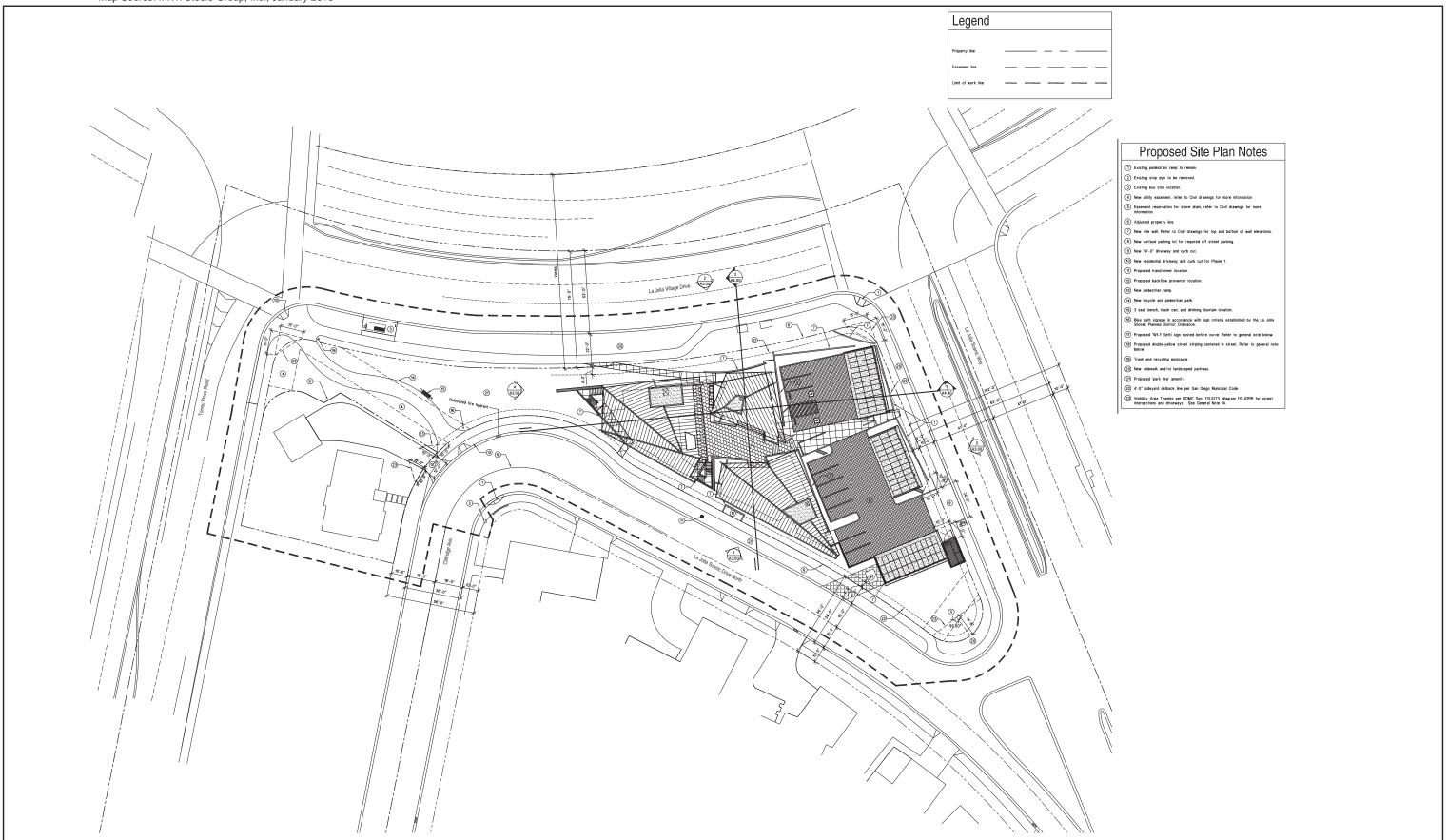






FIGURE 3-5
Phase 2 Ground Floor Building Plan

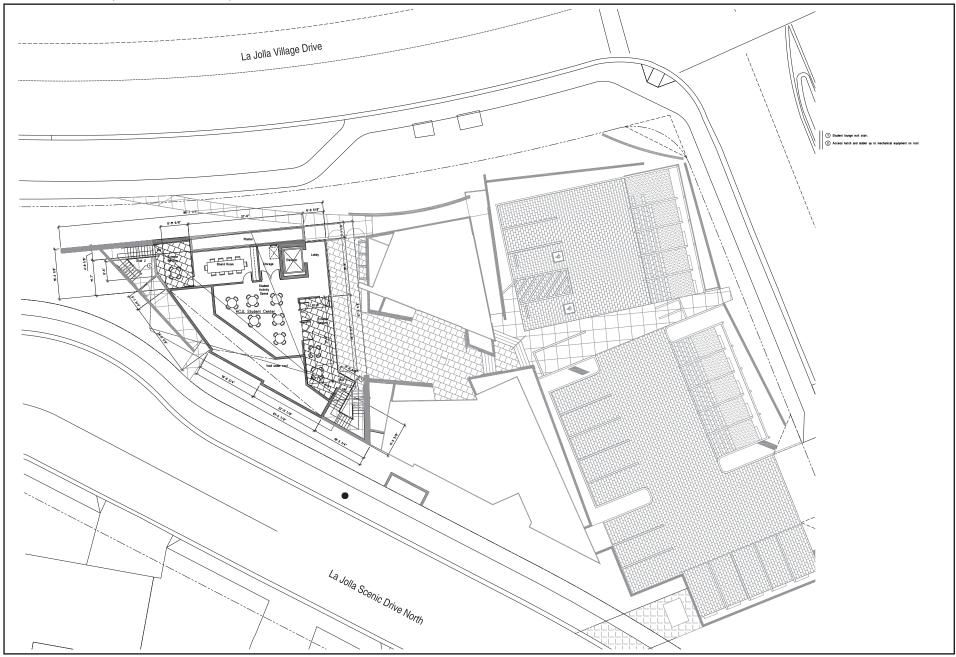
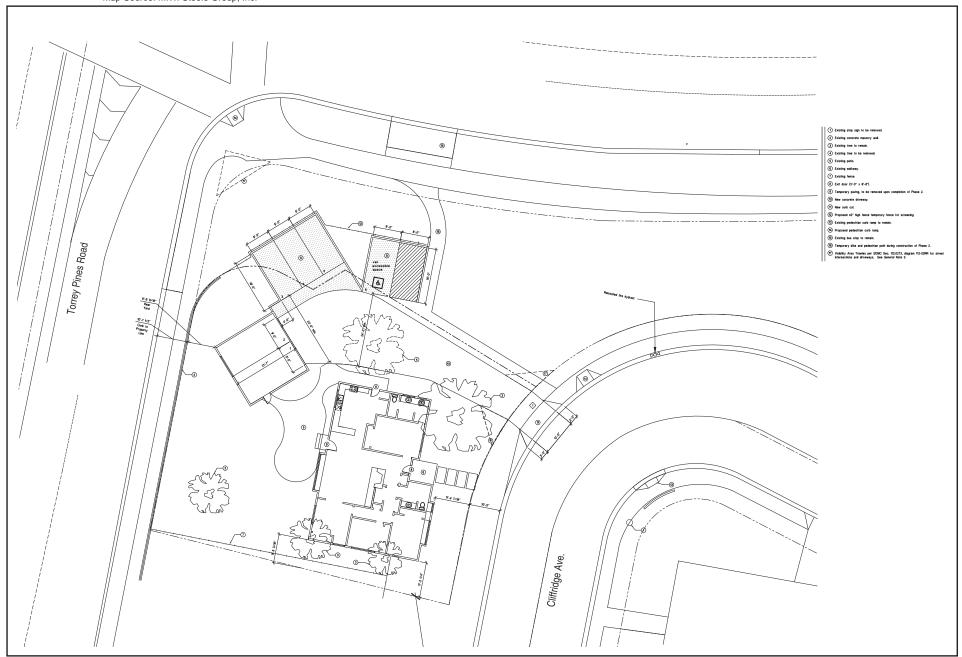




FIGURE 3-6
Phase 2 Second Floor Building Plan





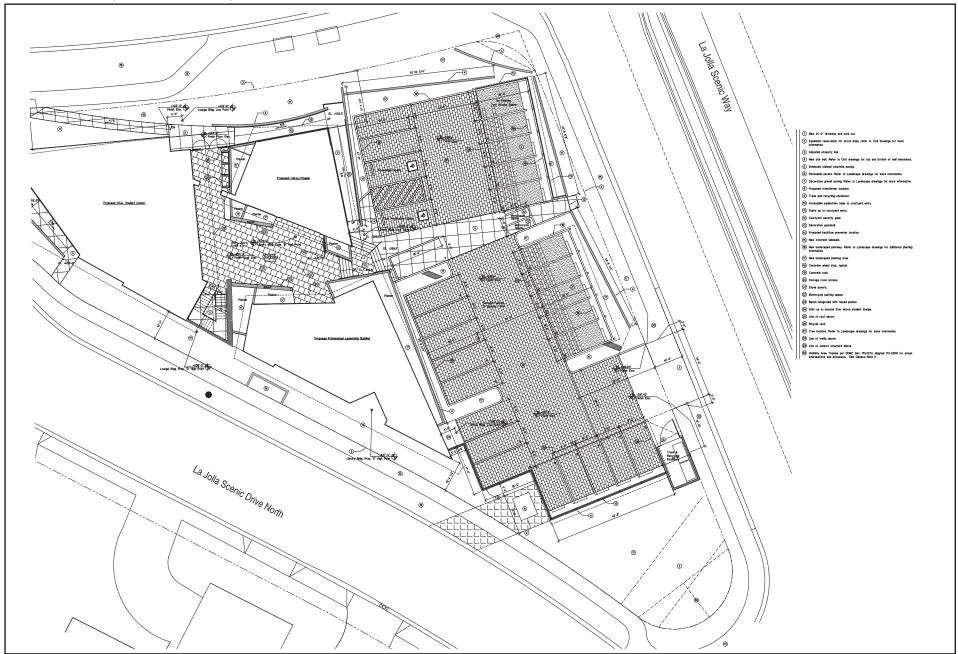
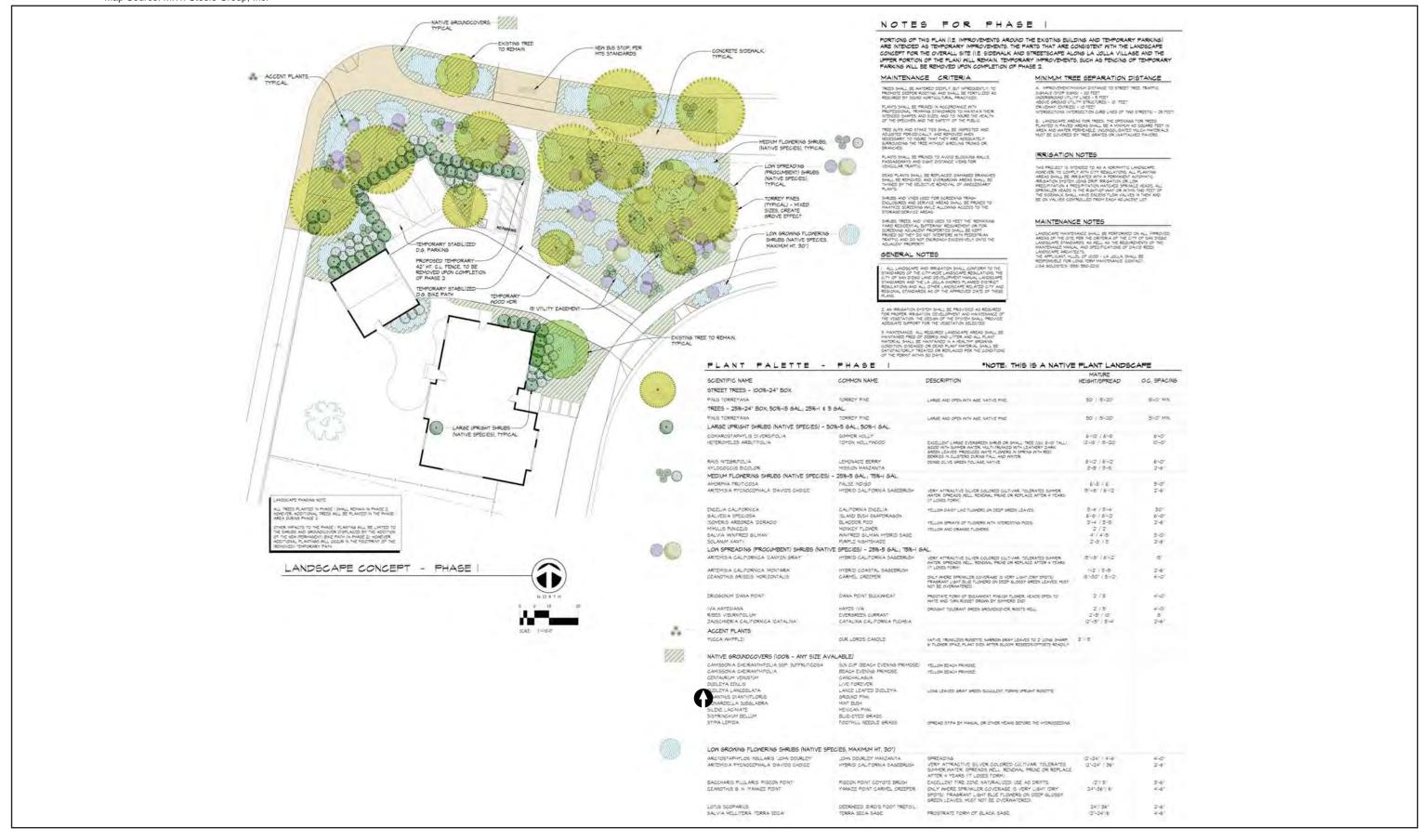




FIGURE 3-8





	PLANT PALETTE -	PHASE 2								
	*NOTE: THIS IS A NATIVE PLANT LANSO	APE	* c * * * *	MATURE						
	SCIENTIFIC NAME	COMMON NAME	DESCRIPTION	HEIGHT/SPREAD	O.C. SPACING		NATIVE GROUNDCOVERS (100% - ANY SIZE AV	AILABLE)		
	STREET TREES - 100%-24" BOX					Millillille	ABROMA MARITIMA	COASTAL SAND VERBENA	PINK INFLORESCENCE ON HAIRY SUCCULENT LIKE LEAVES.	
	HETEROMELES ARBUTIFOLIA	TOYON, HOLLYWOOD	EXCELLENT LARGE EVERGREEN SHRUB OR SMALL TREE (USU. 8-10' TALL), GOOD NITH SUMMER NATER, MULTI-TRUNKED WITH LEATHERY DARK GREEN LEAVES, PRODUCES WHITE FLONERS IN SPRING WITH RED	12'-18' / 15'-20'	10'-0"		AMBROSIA CHAMISSONIS CAMISSONIA CHEIRANTHIFOLIA SSP, SUFFRUTICOSA CENTAURIUM VENUSTUM	SIVER BURR SUN CUP (BEACH EVENING PRIMOSE) CANCHALAGUA	YELLOW BEACH PRIMOSE.	
	PINUS TORREYANA	TORREY PINE	BERRIES IN CLUSTERS DURING FALL AND WINTER. LARGE AND OPEN WITH AGE. NATIVE PINE.	50 / 15-20	15'-0" MIN,		DUDLEYA EDULIS DUDLEYA LANGEOLATA	LIVE FOREVER LANCE LEAFED DUDLEYA	LONG LEAVED GRAY GREEN SUCCULENT, FORMS UPRIGHT ROSETTE.	
	TREES - 25%-24" BOX; 50%-15 GAL.; 25%-1 \$	5 GAL.					LINANTHUS DIANTHIFLORUS	GROUND PINK		
my ()	HETEROMELES ARBUTIFOLIA	TOYON, HOLLYWOOD	SEE NOTES ABOVE	12'-18' / 15'-20"	10'-0"		MONARDELLA SUBGLABRA SILENE LACINIATE	MINT BUSH MEXICAN PINK		
2	PINUS TORREYANA PLATANUS RACEMOSA	TORREY PINE CALIFORNIA SYCAMORE	LARGE AND OPEN WITH AGE. NATIVE PINE. LARGE, DECIDIOUS TREE, WITH MEDIUM- FAST GROWTH	50 / 15-20 30 / 20	15'-0" MIN. 15'-0" MIN.		SISYRINCHIUM BELLUM	BLUE-EYED GRASS		
-and	QUERCUS AGRIFOLIA	COAST LIVE OAK	EVERGREEN, SHINY PRICKLY LEAVES. GROWS ON HILLSIDES IN CALIFORNIA	20-40 / 20-50	15'-0" MIN.	annim.	STIPA LEPIDA STIPA PULCHRA	POOTHILL NEEDLE GRASS PURPLE NEEDLE GRASS	SPREAD STIPA BY MANUAL OR OTHER MEANS BEFORE THE HYDROSEEDING PURPLISH FLOWERS WITH LONG BRISTLES, ALONG WITH LEAVES, TO GOLDE YELLOW IN SUMMER.	
0	LARGE UPRIGHT SHRUBS (NATIVE SPECIES) - 50%-5 GAL.; 50%-1 GAL.						LOW GROWING FLOWERING SHRUBS (NATIVE SPI	EGIES, MAXIMUM HT. 30")		
	COMAROSTAPHYLIS DIVERSIFOLIA	SUMMER HOLLY	EVELLENT LARGE EVERGERY SIZE OF CHILD	6-10 / 6-8	6'-0"	-011))))))	ARCTOSTAPHYLOS INSULARIS 'JOHN DOURLEY'	JOHN DOURLEY MANZANITA	SPREADING.	12
	HETEROMELES ARBUTIFOLIA	TOYON, HOLLYWOOD	EXCELLENT LARGE EVERGREEN SHRIP OR SMALL TREE (1921, 8-10) TALL), GOOD WITH SUMMER WATER, MULTI-TRUNKED WITH LEATHERY DARK GREEN LEAVES, PRODUCES WHITE FLOWERS IN SPRING WITH RED BERRIES IN CLUSTERS DURING FALL AND WINTER.		101-011		ARTEMISIA PYCNOCEPHALA 'DAVIDS CHOICE'	HYBRID CALIFORNIA SAGEBRUSH	SUMMER MATER. SPREADS WELL. RENEWAL PRUNE OR REPLACE AFTER 4 YEARS (IT LOSES FORM).	
	RHUS INTEGRIFOLIA XYLOCOCCUS BICOLOR	LEMONADE BERRY MISSION MANZANITA	DENSE OLIVE GREEN FOLIAGE, NATIVE.	6'-12' / 6'-12' 3'-5' / 3'-5'	6'-0" 2'-6"		BACCHARIS PILULARIS 'PIGEON POINT' CEANOTHUS G. H. 'YANKEE POINT'	PIGEON POINT COYOTE BRUSH YANKEE POINT CARMEL CREEPER	EXCELLENT FIRE ZONE, NATURALIZED, USE AS DRIFTS, ONLY WHERE SPRINKLER COVERAGE IS VERY LIGHT (DRY	12
8	MEDIUM FLOWERING SHRUBS (NATIVE SPECIES				7.7			THE PARTY OF THE P	SPOTS), FRAGRANT LIGHT BLUE FLOWERS ON DEEP GLOSSY	
	AMORPHA FRUITICOSA ARTEMISIA PYCNOGEPHALA 'DAVIDS CHOICE'	FALSE INDIGO HYBRID CALIFORNIA SAGEBRUSH	VERY ATTRACTIVE SILVER COLORED CULTIVAR TOLERATES SUMMER MATER, SPREADS MELL, RENEMAL PRINE OR REPLACE AFTER 4 YEARS	6'-8' / 6' 5"- 8" / 6'- 2'	5'-0" 2'-6"		LOTUS SCOPARIUS SAI VIA MEI I IFERA TERRA SECA!	DEERWEED, BIRD'S FOOT TREFOIL TERRA SECA SAGE	GREEN LEAVES. MUST NOT BE OVERWATERED. PROSTRATE FORM OF BLACK SAGE	2
	COREOPSIS MARITIMA	SEA DAHLIA	(IT LOSES FORM). YELLOW DAISY LIKE FLOWERS ON MUM-LIKE FOLIAGE	2' / 3'	1'-6"					
	ENCELIA CALIFORNICA	CALIFORNIA ENCELIA	YELLOW DAISY LIKE FLOWERS ON DEEP GREEN LEAVES.	3'-4' / 3'-4'	30"		11 = 7			
	GALVESIA SPECIOSA ISOMERIS ARBOREA 'DORADO'	ISLAND BUSH SNAPDRAGON BLADDER POD		6'-8' / 8'-12'	6'-0"	Ni.				
	MIMULUS PUNICEUS RHAMUNUS 'EVE CASE'	MONKEY FLOMER EVE CASE CA. COFFEEBERRY	YELLOW SPRAYS OF FLOWERS WITH INTERESTING PODS. YELLOW AND ORANGE FLOWERS. EVERGREEN SHRUB, NATIVE TO CALIFORNIA. LARGE BERRIES GREEN, THEN RED, THEN BLACK WHEN RIPE.	3'-4' / 3'-5' 2' / 2' 4-8'/4-8'	2'-6" 3'-0" 3'-6"					
	SALVIA WINIFRED GILMAN	WINIFRED GILMAN HYBRID SAGE		4' / 4'-5'	3'-0"					
(T)	SOLANUM XANTII LOW SPREADING (PROCUMBENT) SHRUBS (NAT	PURPLE NIGHTSHADE	GAI	2'-3' / 3'	2'-6"	1	<u> </u>			
	ARTEMISIA CALIFORNICA CANYON GRAY	HYBRID CALIFORNIA SAGEBRUSH	VERY ATTRACTIVE SILVER COLORED CULTIVAR TOLERATES SUMMER WATER SPREADS WELL RENEMAL PRIME OR REPLACE AFTER 4 YEARS (IT LOSES FORM).	5"- 8" / 6'- 2'	15"					
	ARTEMISIA CALIFORNICA MONTARA CEANOTHUS GRISEUS HORIZONTALIS	HYBRID COASTAL SAGEBRUSH CARMEL GREEPER	ONLY WHERE SPRINKLER COVERAGE IS VERY LIGHT (DRY SPOTS). FRAGRANT LIGHT BLUE FLOWERS ON DEEP GLOSSY GREEN LEAVES. MUST NOT BE OVERWATERED.	1'-2' / 3'-5' 8"-30" / 5'-12'	2'-6" 4'-0"		***			
	ERIOGONUM 'DANA POINT'	DANA POINT BUCKMHEAT	PROSTATE FORM OF BUCKWHEAT, PINKISH FLOWER, HEADS OPEN TO WHITE AND TURN RUSSET BROWN BY SUMMERS' END.	2' / 5'	4'-0"					
	IVA HAYESIANA RIBES VIBURNIFOLIUM ZAUSCHNERIA CALIFORNICA 'CATALINA'	HAYES IVA EVERGREEN CURRANT CATALINA CALIFORNIA FUCHSIA	DROUGHT TOLERANT GREEN GROUNDCOVER, ROOTS WELL.	2' / 5' 2'-3' / 10' 12"-15" / 3'-4'	4'-0" 8' 2'-6"			~		
*	ACCENT PLANTS									1
	YUCCA WHIPPLEI	OUR LORDS CANDLE	NATIVE, TRUNKLESS ROSETTE, NARROW GRAY LEAVES TO 2' LONG, SHARP, 6' FLOWER SPIKE, PLANT DIES AFTER BLOOM, RESEEDS/OFFSETS READILY.	3' / 5'						
						BUILDING	5 COVERED AREA 5509 S.F. (34.3%)			
						DXXXXI	/HARDSCAPE AREA 2,52 S.F. (13,8%)			
						9777777				
						PLANTA	BLE AREA 15,648 S.F. (51,9%)			
							SITE AREA 33,687 S.F. (100%)			





East Elevation







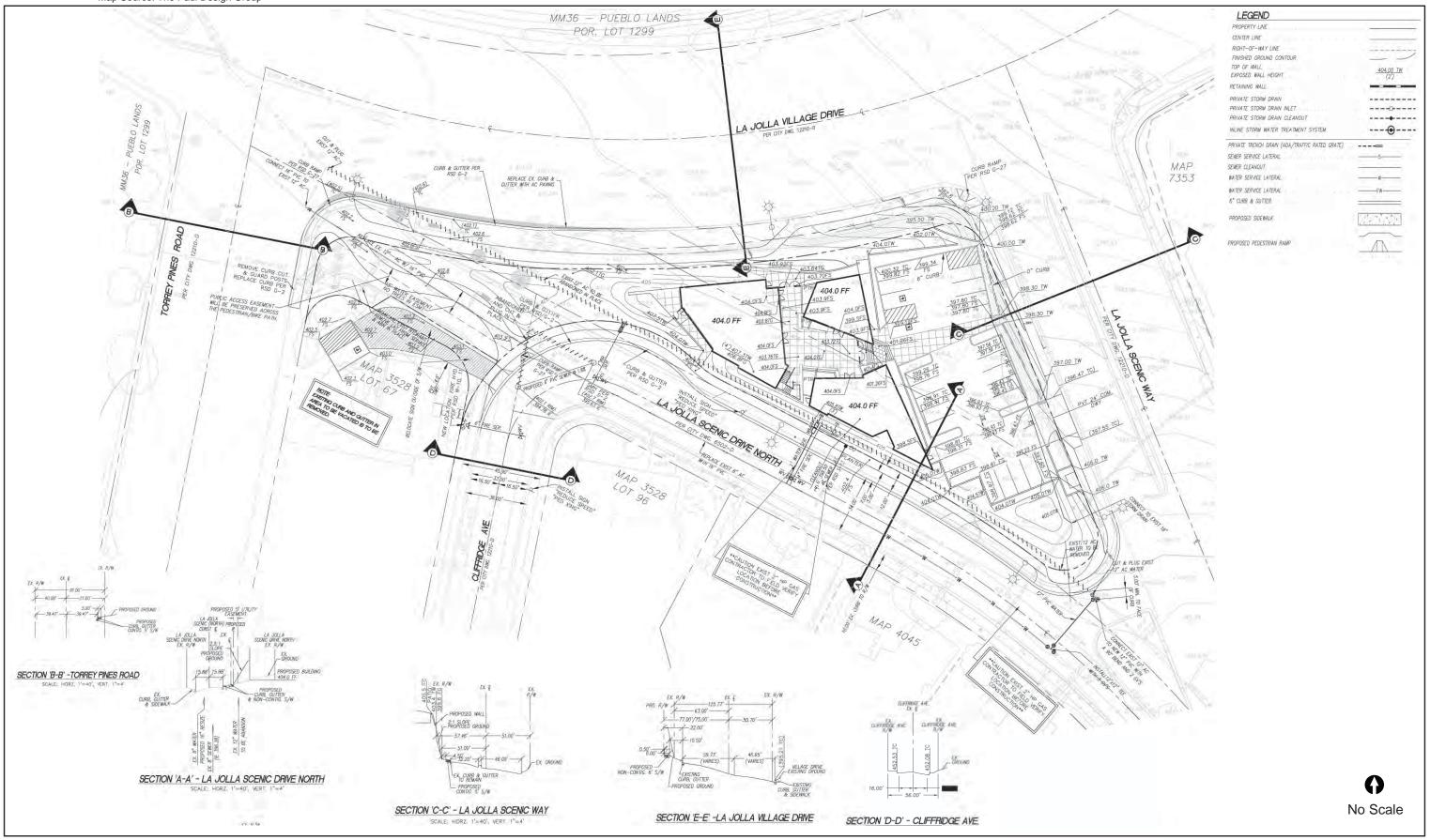
North Elevation

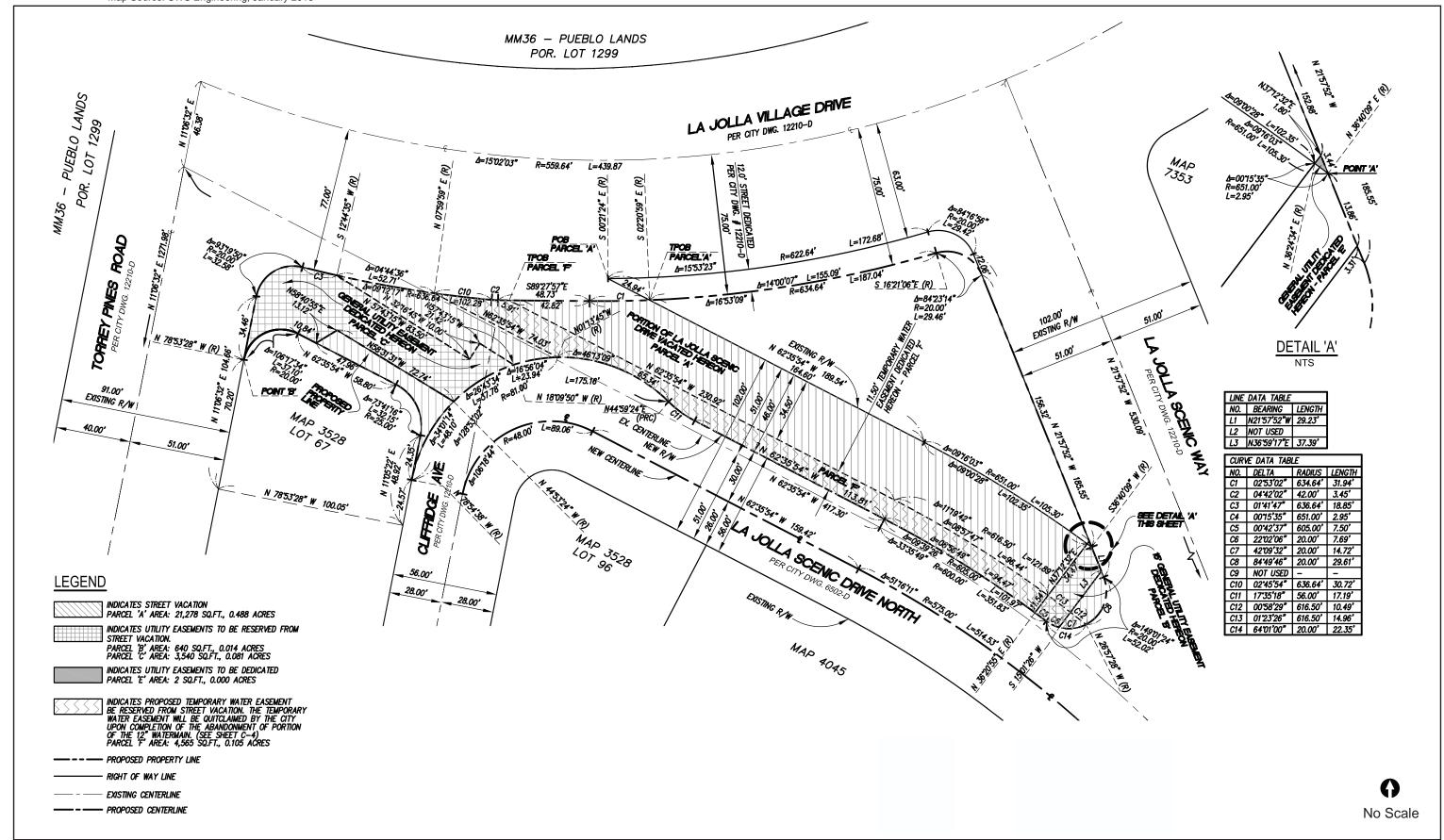


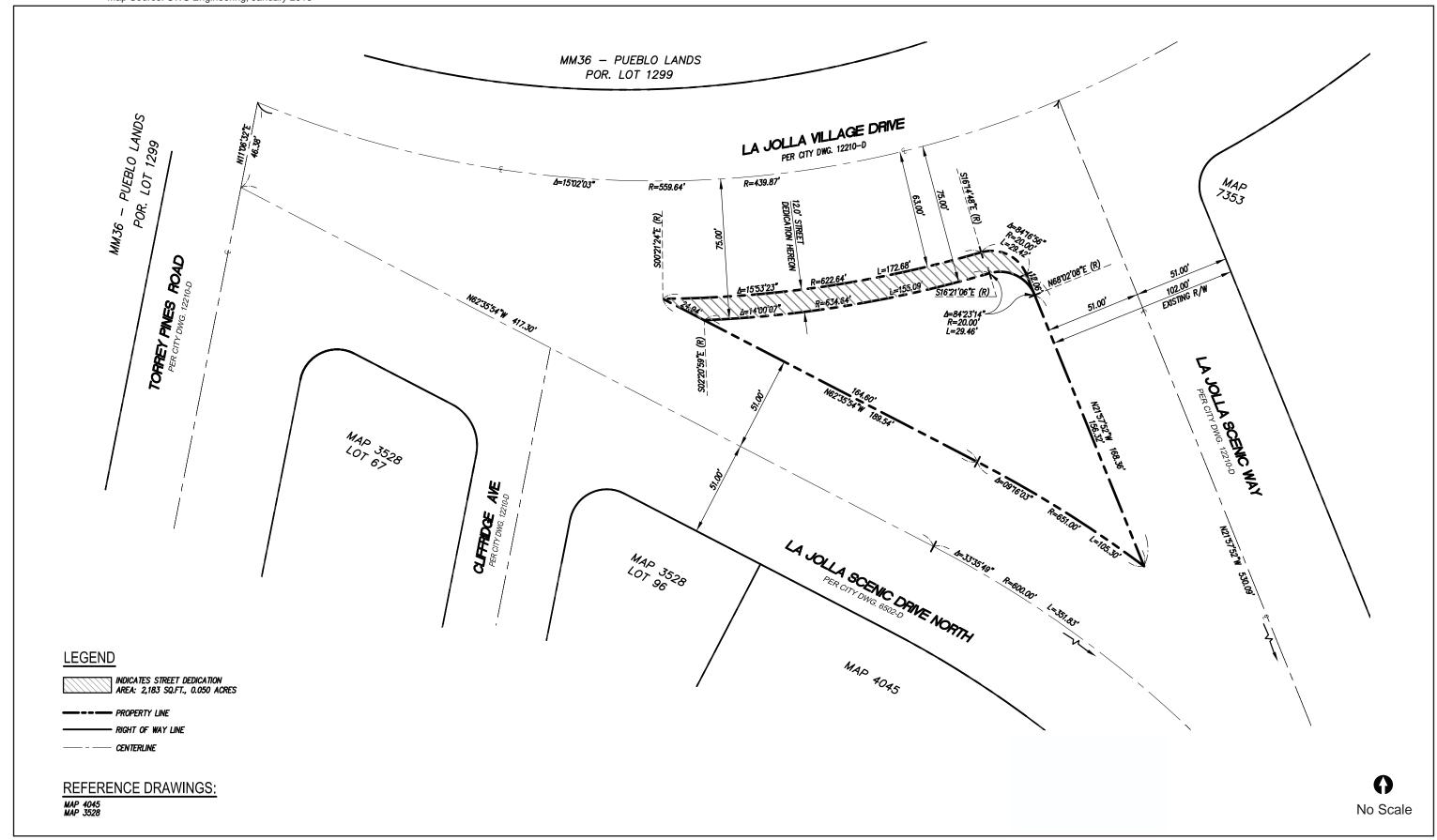




Map Source: The Paul Design Group







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

of San Diego, of the La Jolla Community Plan, and of the La Jolla Shores Precise Plan.

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 <u>Center building</u> 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 preexisting 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 <a href="mailto: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.

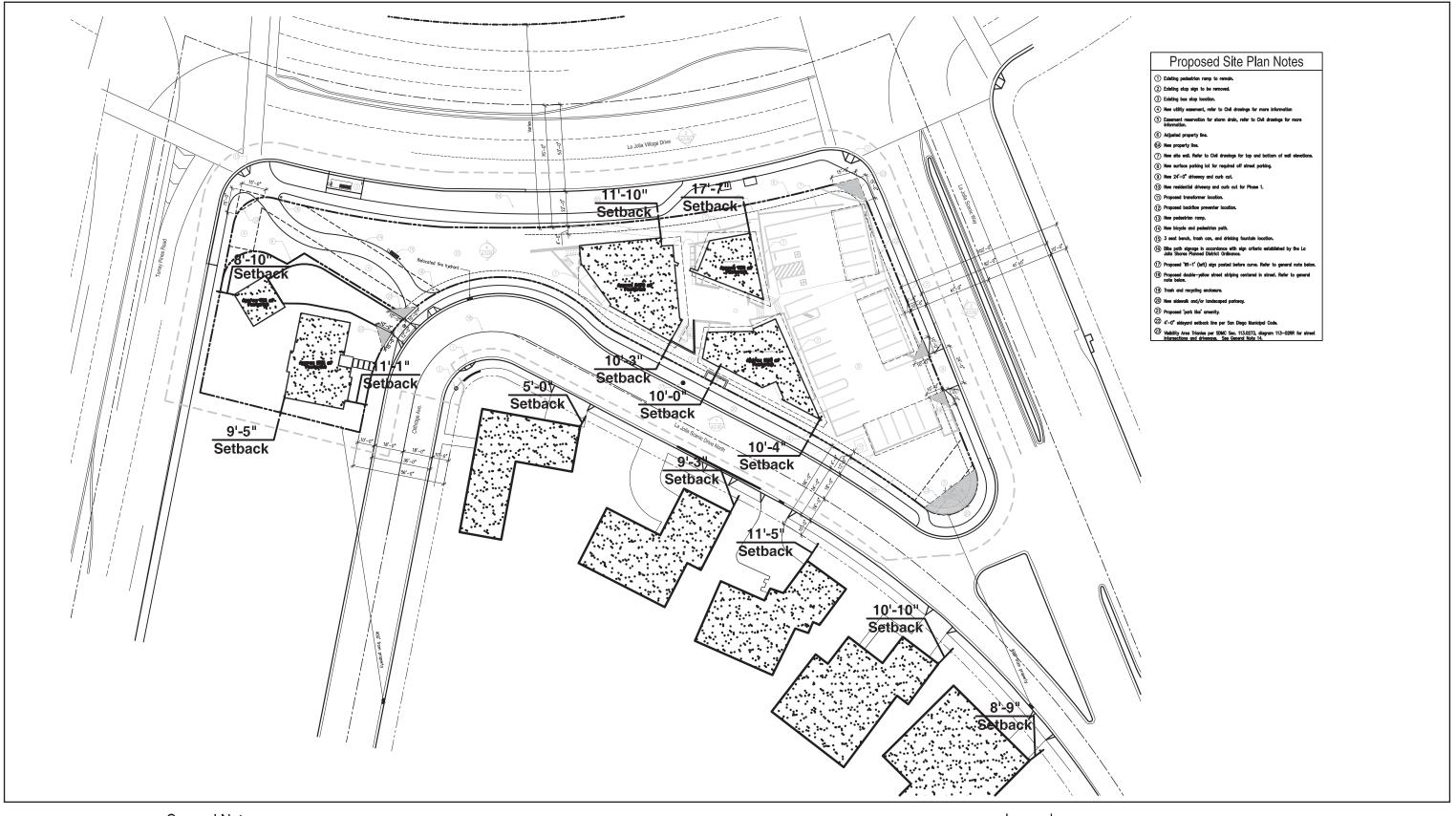
4.1.4.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements

No mitigation is required.



General Notes

- Refer to the Civil drawings for existing/proposed utilities, BMP requirements, and site work.
- Condition of permit: any sign design must comply with sign design regulations in LDC Chapter 14, Article 2, Division 12. (LDC 143.0410(g))
- 4. For plan dimensions refer to Architectural building plan sheets
- Post indicator valves, fire department connections, and alarm bell are to be located on the address/access side of the structures. (UFC
- 1001.4)
 6. For all existing and proposed R.O.W. widths, property line definitions, and curb to property line distances refer to Civil drawings (existing and proposed boundary exhibits provided by civil engineer).
- For all proposed sidewalk and easement widths refer to Civil drawings (conceptual grading plan provided by civil engineer).
- 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 building permit.
- 9. New building (Phase 2) will be fire sprinklered in accordance with requirements of the 2007 CBC & NFPA 13.
 10. Refer to Civil drawings for proposed fire hydrant locations.
- Post indicator valves, fire department connections, and alarm bell are to be located on the address/access side of the structure. (UFC 1001.4)
- Provide fire access roadway signs or red curbs in accordance with FHPS Policy A-00-1

Legend

14. No objects higher than 36 inches may be proposed in the visibility areas. If any portion of the visibility areas lies within the public right of way, no vegetation in these areas will exceed 24 inches in height.



FIGURE 4.1-1 Setback Analysis

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

	LOS E			<u>.</u>
Segment	Capacity ^a	Volume ^b	LOS	V/C
La Jolla Village Drive				
Expedition Way to Torrey Pines Road	40,000	32,570	D	0.814
Torrey Pines Road to La Jolla Scenic Way	45,000	44,790	Е	0.995
La Jolla Scenic Way to Gilman Drive	60,000	49,200	С	0.820
Torrey Pines Road				
La Jolla Village Drive to Glenbrook Way	30,000	26,740	Е	0.891
La Jolla Scenic Way				
La Jolla Village Drive to La Jolla Scenic Drive North	15,000 ^c	10,090	D	0.673
La Jolla Scenic Drive North			Better	
Cliffridge Avenue to La Jolla Scenic Way	2,200 ^d	1,320	than C	N/A

^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-desac 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
EXISTING INTERSECTION OPERATIONS

			Peak		
No.	Intersection	Control Type	Hour	Delay ^a	LOS^b
1 La Jolla Village Drive/Torrey Pines Road		Signal	AM	21.6	С
		Signal	PM	33.1	С
2) La Jalla Villaga Driva/La Jalla Scania Way		AM	15.2	В
2	La Jolla Village Drive/La Jolla Scenic Way	Signal	PM	20.8	С
3	La Jalla Casnia Driva North/Cliffridge Avenue	OWSC°	AM	8.6	Α
3	La Jolla Scenic Drive North/Cliffridge Avenue	OVVSC	PM	8.6	Α
1	La Jalla Cassia May/La Jalla Cassia Driva North	OWEC	AM	14.0	В
4	La Jolla Scenic Way/La Jolla Scenic Drive North	OWSC	PM	12.3	В
_	La Jalla Cassia Driva North/Carsinita Dassa	l la acatacil a d ^d	AM	13.7	В
5	La Jolla Scenic Drive North/Caminito Deseo	Uncontrolled ^a	PM	12.7	В

^aAverage delay expressed in seconds per vehicle

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:

^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 stopcontrolled movement since vehicles utilizing this movement were observed to stop.

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

		Allowable Change Due to Project Impact ¹								
	Free	ways	Roadw	ay Segments	Intersections	Ramp Metering ³				
LOS with Project ²	V/C	Speed (mph)	V/C	Speed (mph)	Delay (seconds)	Delay (minutes)				
E (or ramp meter delays above 15 minutes)	0.010	1.0	0.02	1.0	2.0	2.0				
F (or ramp meter delays above 15 minutes)	0.005	0.5	0.01	0.5	1.0	1.0				

If 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 onor off-ramp storage capacities, the project applicant shall be responsible for mitigating the project's direct significant and/or cumulatively considerable traffic impacts

²All 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 This information revealed 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 30-50 students. -and, at most, 50 patrons to the site. However, fFor the purpose of being a conservative in the trip generation (and parking) analysis, assumptions for this report, focus on a maximum of 100 persons were assumed to arrive visitors 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, for a 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 those20 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

		Person lk/Bike		_		N	/lode (of Trave	el				
						/Bike							
					Tri	ps ^b		Drive					
	Stud	lents	S	taff	Stud	lents	Stuc	dents ^c	Sta	aff ^{d,e}	Tot	al Drive	e Trips
Time of Day	ln	Out	ln	Out	In	Out	In	Out	In	Out	In	Out	Total
8:00 - 9:00 a.m.	0	0	7	0	0	0	0	0	7	0	7	0	7
9:00 - 10:00 a.m.	10	5	0	0	8	4	1	0	0	0	1	0	1
10:00 - 11:00 a.m.	40	5	0	0	32	4	4	0	0	0	4	0	4
11:00 – noon	30	10	0	0	24	8	3	1	0	0	3	1	4
noon – 1:00 p.m.	20	30	2	2	16	24	2	3	2	2	4	5	9
1:00 - 2:00 p.m.	10	30	0	0	8	24	1	3	0	0	1	3	4
2:00 - 3:00 p.m.	20	20	0	0	16	16	2	2	0	0	2	2	4
3:00 - 4:00 p.m.	10	10	0	0	8	8	1	1	0	0	1	1	2
4:00 - 5:00 p.m.	5	0	0	0	4	0	0	0	0	0	0	0	0
5:00 - 6:00 p.m.	10	20	0	5	8	16	1	2	0	5	1	7	8
6:00 – 7:00 p.m.	30	5	0	0	24	4	3	1	0	0	3	1	4
7:00 - 8:00 p.m.	10	25	0	0	8	20	1	3	0	0	1	3	4
8:00 - 9:00 p.m.	5	30	0	2	4	24	1	3	0	2	1	5	6
9:00 - 10:00 p.m.	0	10	0	0	0	8	0	1	0	0	0	1	1
Total	200	200	9	9	160	160	20	20	9	9	29	29	58

^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).

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.

^bNumber of students coming into and out of the site either by walk or bike.

^cAssumes a student vehicle occupancy rate of two (2) persons per vehicle based on UCSD and UCLA survey data collected.

^dAll 7 staff members were assumed to drive alone to the facility.

^eAssumes staff members enter and leave the site during the noon to 1:00 p.m. lunch hour.

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

	Functional	LOS E	E	xisting		Exis	ting + Pro	piect		Impact
Street Segment	Classification	Capacity ^a	ADT ^b	LOS°	V/C ^d	ADT	LOS	V/C	Δ V/C ^e	Type
La Jolla Village Drive										
Expedition Way to	4-Ln Major									
Torrey Pines Road	Arterial	40,000	32,570	D	0.814	32,585	D	0.815	0.001	None
Torrey Pines Road to	6-Ln Major									
La Jolla Scenic Way	Arterial	45,000 ^h	44,790	E	0.995	44,810	Е	0.996	0.001	None
La Jolla Scenic Way	6-Ln Prime									
to Gilman Drive	Arterial	60,000	49,200	С	0.820	49,237	С	0.821	0.001	None
Torrey Pines Road										
La Jolla Village Drive										
to Glenbrook Way	4-Ln Collector	30,000	26,740	E	0.891	26,746	Е	0.892	0.001	None
La Jolla Scenic Way										
La Jolla Village Drive										
to La Jolla Scenic										
Drive North	2-Ln Collector	15,000 [†]	10,090	D	0.673	10,148	D	0.677	0.004	None
La Jolla Scenic Drive N	Vorth									
Cliffridge Avenue to										
La Jolla Scenic Way	Sub-Collector	2,200 ^g	1,320	≥ C	N/A	1,321	≥C	N/A	N/A	None

^aCity of San Diego Roadway Capacity Standards.

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.

^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.

⁹Non 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.

		Peak	Peak Existing			g Plus Phase 2	Δ	Impact
Intersection	Control Type	Hour	Delay ^a	LOS ^b	Delay	LOS	Delay ^c	Туре
La Jolla Village Drive/	Cianal	AM	21.6	С	21.6	С	0.0	None
Torrey Pines Road	Signal	PM	33.1	С	33.1	С	0.0	None
2. La Jolla Village Drive/	Ciava al	AM	15.2	В	15.3	В	0.1	None
La Jolla Scenic Way	Signal	PM	20.8	С	21.0	С	0.2	None
3. La Jolla Scenic Drive	OWOO d	AM	8.6	Α	8.6	Α	0.0	None
North/ Cliffridge Way	OWSC d	PM	8.6	Α	8.6	Α	0.0	None
4. La Jolla Scenic Way/	014/00	AM	14.0	В	14.0	В	0.0	None
La Jolla Scenic Drive	OWSC	PM	12.3	В	12.4	В	0.1	None
5. La Jolla Scenic Drive	11	AM	13.7	В	13.7	В	0.0	None
North/ Caminito Deseo	Uncontrolled ^e	PM	12.7	В	12.8	Α	0.1	None

TABLE 4.2-6
EXISTING PLUS PHASE 1/PHASE 2 INTERSECTION OPERATIONS

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.

^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 Deseo was analyzed as the minor street stop-controlled movement since vehicles utilizing this movement were observed to stop.

- 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.
- 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

- 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.
- 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 approximately191,000 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 4.2-7
NEAR-TERM SEGMENT OPERATIONS

_	Functional	LOS E	Existing Plus Near-term Projects				r-term W e 1/Pha			Imnaa
Cammant									Δ	Impac
Segment	Classification	Capacity	ADT⁵	LOS°	V/Cd	ADT	LOS	V/C	V/C ^e	t Type
La Jolla Village Drive										
Expedition Way to	4-Lane Major	40,000	36,680	Е	0.917	36,695	Е	0.917	0.000	None
Torrey Pines Road	Arterial									
Torrey Pines Road to	6-Lane Major	45,000 ^h	49,060	F	1.090	49,080	F	1.091	0.000	None
La Jolla Scenic Way	Arterial									
La Jolla Scenic Way to	6-Lane	60,000	53,580	D	0.893	53,617	D	0.894	0.001	None
Gilman Drive	Prime	•	•			•				
	Arterial									
Torrey Pines Road	,									
La Jolla Village Drive to	4-Lane	30,000	27.440	Е	0.915	27,446	Е	0.915	0.000	None
Glenbrook Way	Collector	00,000	,	_	0.0.0	,	_	0.0.0	0.000	
La Jolla Scenic Way	Comocion									
La Jolla Village Drive to	2-Lane	15,000 ^f	10.380	D	0.692	10.438	D	0.696	0.004	None
La Jolla Scenic Drive	Collector	10,000	10,000		0.002	10,400		0.000	0.004	140110
North	Concetor									
La Jolla Scenic Drive North										
	Sub-	2,200 ^g	1,350	> C	N/A	1,351	> C	N/A	N/A	None
Cliffridge Avenue to		2,200	1,350	> 0	IN/A	1,331	<i>></i> 0	IN/A	IN/A	INOTIE
La Jolla Scenic Way	Collector ^r									

^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

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.

⁹Non Circulation Element Residential Collector capacity of LOS C threshold of 2,200 was used.

ⁿLa 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

			Peak	Near- Proje		Near-te Phase 1/		Δ	Impact
No.	Intersection	Control Type	Hour	Delaya	LOS ^b	Delay	LOS	Delay ^c	Туре
1	La Jolla Village Drive/	Signal	AM	26.6	С	23.1	С	0.1	None
	Torrey Pines Road	_	PM	44.8	D	36.2	D	0.1	None
2	La Jolla Village Drive/	Signal	AM	16.5	В	16.1	В	0.1	None
	La Jolla Scenic Way	_	PM	24.4	С	23.0	С	0.1	None
3	La Jolla Scenic Drive	OWSC ^d	AM	8.6	Α	8.6	Α	0.0	None
	North/ Cliffridge Avenue		PM	8.6	Α	8.6	Α	0.0	None
4	La Jolla Scenic Way/	owsc	AM	14.4	В	14.3	В	0.0	None
	La Jolla Scenic Drive North		PM	12.7	В	12.6	В	0.1	None
5	La Jolla Scenic Drive	Uncontrolled ^e	AM	14.1	В	14.0	В	0.0	None
	North/Caminito Deseo		PM	13.1	В	13.1	В	0.2	None

^aAverage delay expressed in seconds per vehicle

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

^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 Deseo was analyzed as the minor street stop-controlled movement since vehicles utilizing this movement were observed to stop.

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

Segment	Roadway	LOS E	Year 2030 without Phase 1/Phase 2				r 2030 v se 1/Pha		Δ	Impact
•	Classification	Capacity ^a	ADT⁵	LOS ^c	V/C ^d	ADT	LOS	V/C	V/C ^e	Туре
La Jolla Village Drive										
Expedition Way to	4-Lane Major	40,000	39,100	Е	0.978	39,115	Е	0.978	0.000	None
Torrey Pines Road	Arterial									
Torrey Pines Road to	6-Lane Major	45,000 ^h	54,000	F	1.200	54,020	F	1.200	0.000	None
La Jolla Scenic Way	Arterial									
La Jolla Scenic Way to	6-Lane Prime	60,000	57,200	E	0.953	57,237	E	0.954	0.001	None
Gilman Drive	Arterial									
Torrey Pines Road										
La Jolla Village Drive to	4-Lane	30,000	30,800	F	1.027	30,806	F	1.027	0.000	None
Glenbrook Way	Collector									
La Jolla Scenic Way										
La Jolla Village Drive to	2-Lane	15,000 ^t	11,400	D	0.760	11,458	D	0.764	0.008	None
La Jolla Scenic Drive North	Collector									
La Jolla Scenic Drive North					N/A					
Cliffridge Avenue to	Sub-	2,200 ^g	1,490	> C		1,491	> C	N/A	N/A	None
La Jolla Scenic Way	Collector ^f									

City of San Diego Roadway Capacity Standards

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.

^bAverage Daily Traffic Volumes

^cLevel of Service

^dVolume to Capacity ratio

eIncrease in V/C due to project

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.

⁹Non 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 4.2-10
YEAR 2030 INTERSECTION OPERATIONS

				Year 2030 without		Year 20	Year 2030 with		
			Peak	Phase 1/Phase 2		Phase 1	Phase 1/Phase 2		Impact
No.	Intersection	Control Type	Hour	Delaya	LOS ^b	Delay	LOS	Delay ^c	Type
1	La Jolla Village Drive/	Signal	AM	27.4	С	27.6	С	0.2	None
	Torrey Pines Road	_	PM	45.2	D	45.5	D	0.3	None
2	La Jolla Village Drive/	Signal	AM	17.2	В	17.3	В	0.1	None
	La Jolla Scenic Way		PM	26.3	С	26.6	С	0.3	None
3	La Jolla Scenic Drive	OWSC d	AM	8.7	Α	8.7	Α	0.0	None
	North/Cliffridge Avenue		PM	8.7	Α	8.7	Α	0.0	None
4	La Jolla Scenic Way/	OWSC	AM	16.2	С	16.2	С	0.0	None
	La Jolla Scenic Drive North		PM	13.9	С	14.1	В	0.2	None
5	La Jolla Scenic Drive	Uncontrolled e	AM	16.2	С	16.2	С	0.0	None
	North/Caminito Deseo		PM	14.2	В	14.4	В	0.2	None

^aAverage delay expressed in seconds per vehicle

Year 2030 with Phase 1/Phase 2

Street Segments

Figure 4.2-9 shows Year 2030 with Phase 1/Phase 2ADT 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

^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 Deseo was analyzed as the minor street stop-controlled movement since vehicles utilizing this movement were observed to stop.

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 generated 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.

TABLE 4.2-11
EXISTING WITH IMPROVEMENTS OPTION – INTERSECTION OPERATIONS

Intersection	Control Type	Peak Hour -	Existing Current 2		Existing With Improvements	
			Delay ^a	LOS- ^b	Delay	LOS
1. La Jolla Village Drive/	Cianal	AM	21.6	C	21.6	C
Torrey Pines Road	Signal	PM	33.1	C	33.1	C
2. La Jolla Village Drive/	Signal	AM	15.2	₽	15.2	₿
La Jolla Scenic Way		PM	20.8	C	20.8	C
3. La Jolla Scenic Drive	OW00 6	AM	8.6	A	8.6	A
North/ Cliffridge Way	OWSC °	PM	8.6	A	8.6	A
4. La Jolla Scenic Way/ La	OWSC	AM	14.1	A	14.1	A

	Jolla Scenic Drive North		PM	12.2	₿	12.3	₽
5.	La Jolla Scenic Drive	Uncontrolled ^d	AM	13.7	₿	13.7	₿
	North/ Caminito Deseo		PM	12.6	₽	12.7	₿

^aAverage delay expressed in seconds per vehicle

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.

ELevel of Service

^cIncrease in delay due to project

OWSC - One-Way Stop Controlled intersection. Minor street delay reported.

^eThis intersection is currently uncontrolled. However, Caminito Deseo was analyzed as the minor street stopcontrolled movement since vehicles utilizing this movement were observed to stop.

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 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. 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 of the 34 students who 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. Because 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 Uturn 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 Uturn 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.

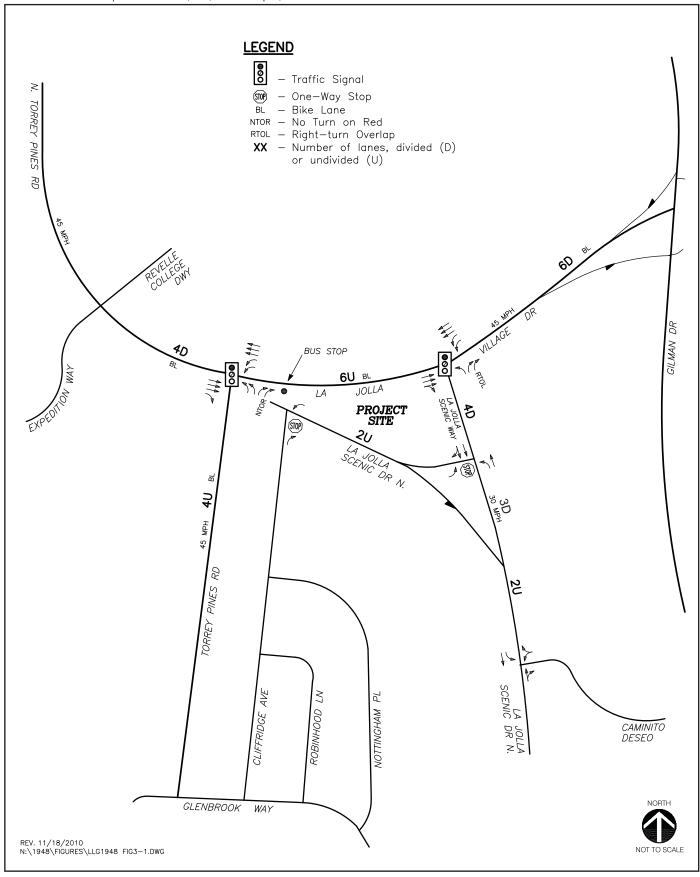
4.2.5.3 Mitigation, Monitoring, and Reporting

a. Phase 1/Phase 2

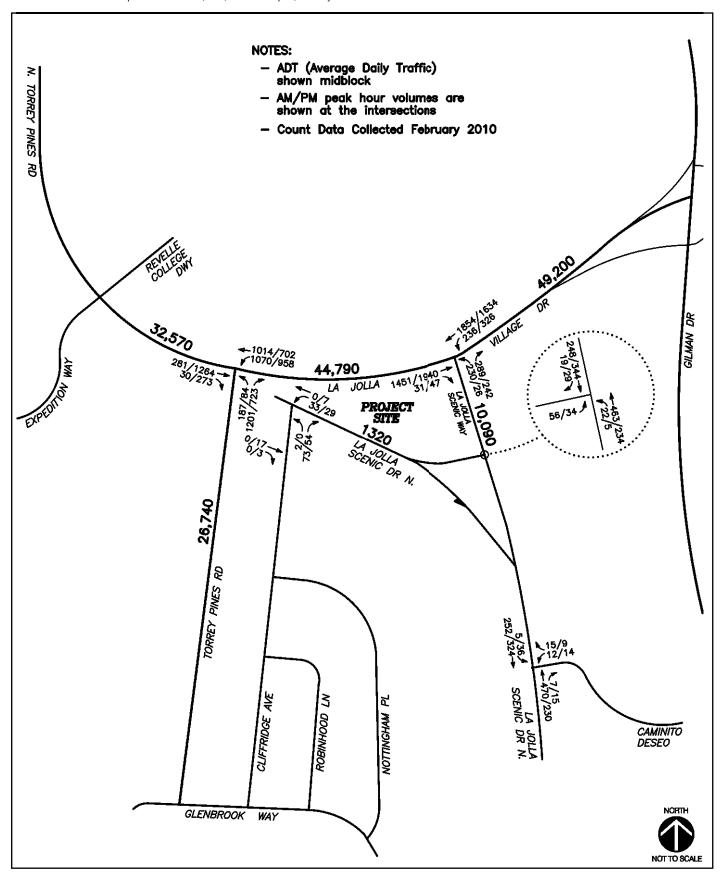
No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.







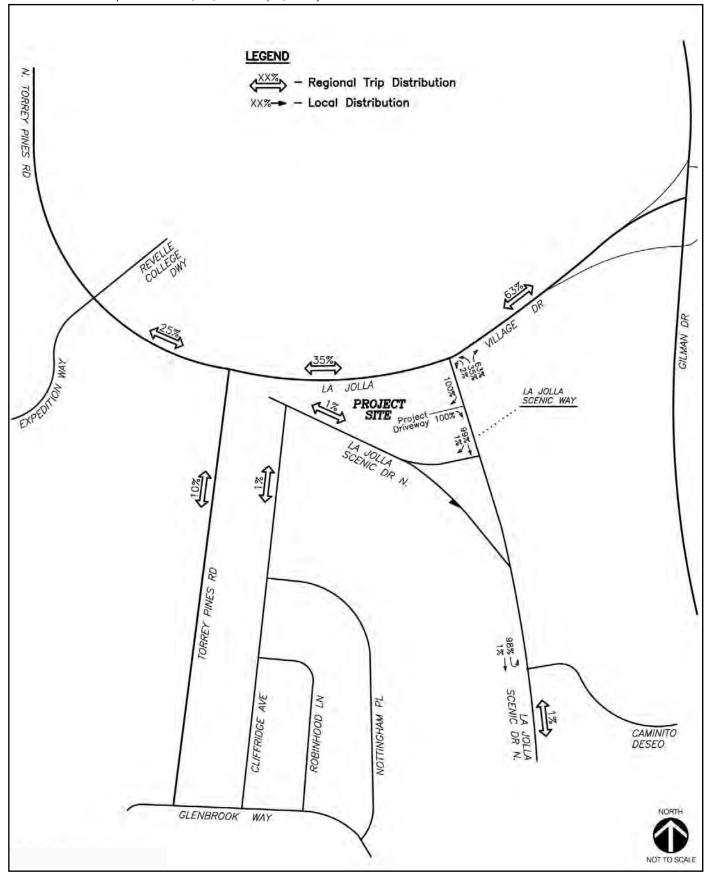
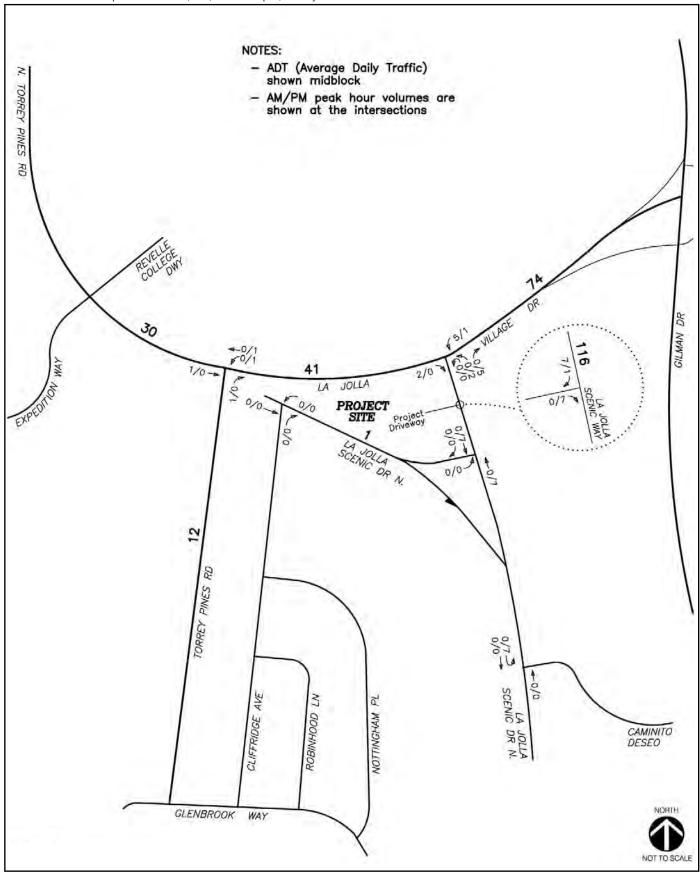
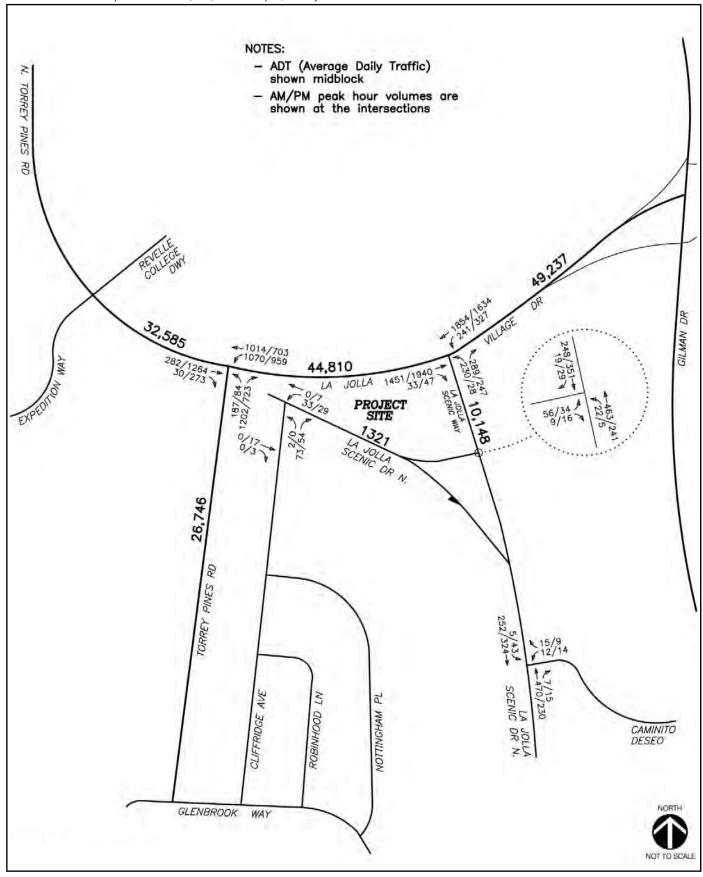
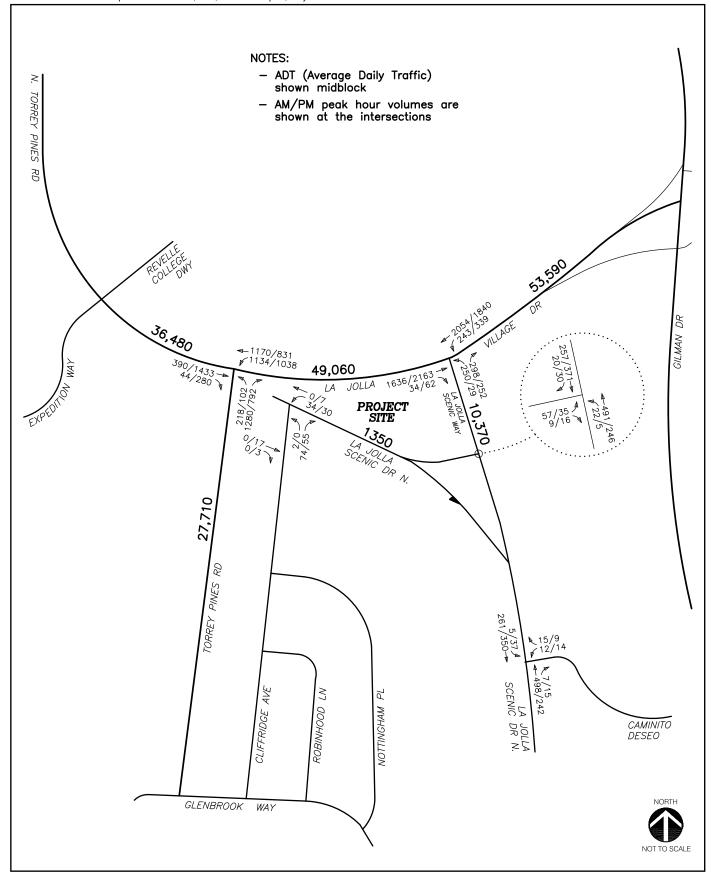
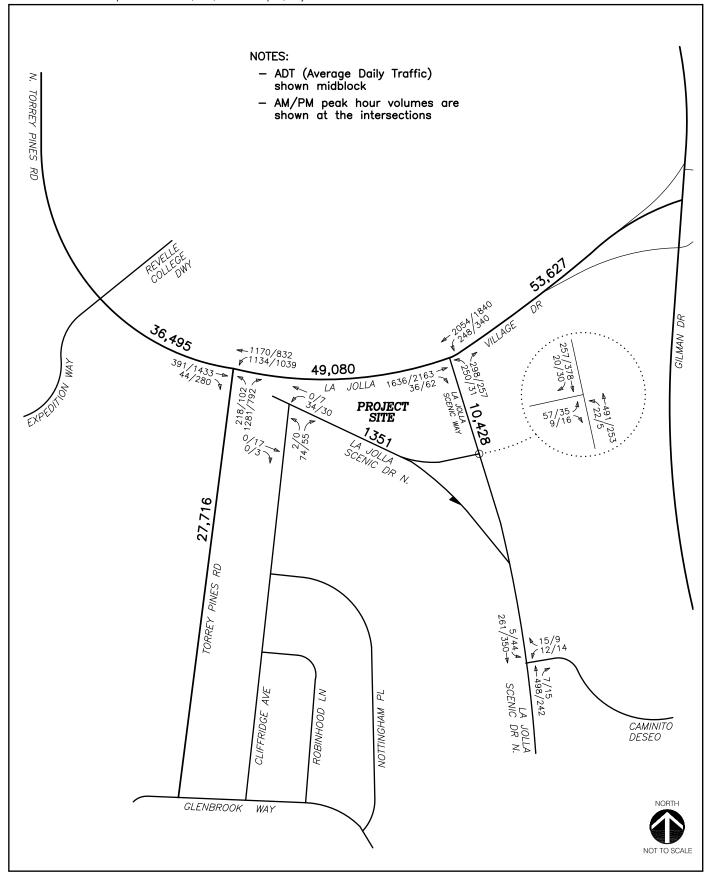


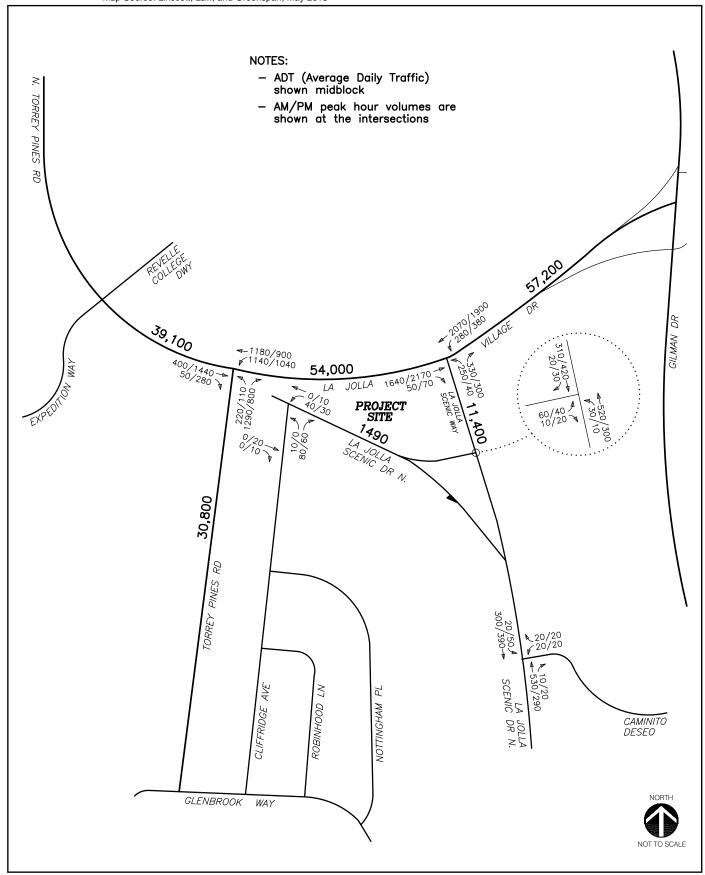
FIGURE 4.2-3











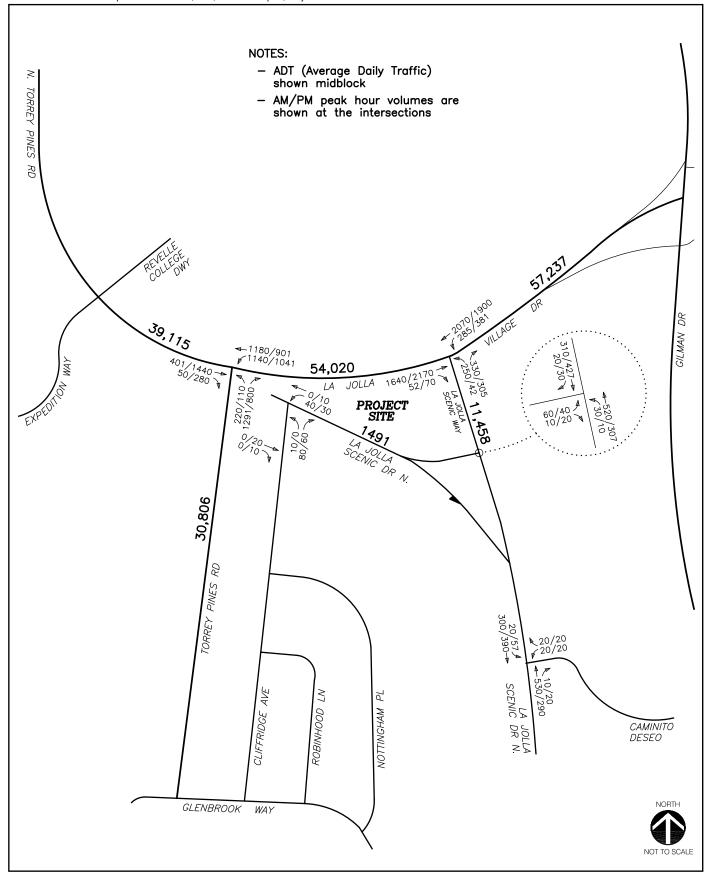


FIGURE 4.2-9





Phase 1/Phase 2 ROW Vacation: Changes in On-street Parking

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

Scientific Name	Common Name	Origin
Amsinckia menziesii	rancher's fireweed	N
Atriplex semibaccata	Australian saltbush	I
Avena fatua	wild oat	I
Brassica nigra	black mustard	I
Bromus diandrus	ripgut grass	I
Bromus hordeaceus	smooth brome	I
Carpobrotus chilensis	sea fig	ı
Chamaerops humilis	Mediterranean fan palm	ı
Chenopodium sp.	goosefoot	I
Conyza canadensis	horseweed	ı
Cynodon dactylon	Bermuda grass	I
Erodium moschatum	green-stemmed filaree	ı
Eucalyptus spp.	eucalyptus	ı
Isocoma menziesii	coast goldenbush	N
Isocoma menziesii var. decumbens	decumbent goldenbush	N
Malva parviflora	cheeseweed, little mallow	ı
Melilotus indica	sourclover	ı
Mesembryanthemum crystallinum	crystalline ice plant	ı
Lamarckia aurea	goldentop	ı
Pinus sp.	pine	ı
Salsola tragus	Russian thistle, tumbleweed	
Sonchus oleraceus	common sow thistle	I
Taraxacum officinale	dandelion	
Vulpia myuros var. myuros	rattail fescue	

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 polyglottos 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 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 (CNDDB) (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 CNDDB (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 CNDDB (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.

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.

4.4.3.2 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 2would 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

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

	SDG&E 2009
Energy Source	Power Mix* (actual)
Renewables	10%
- Biomass & waste	3%
 Geothermal 	<1
 Small hydroelectric 	<1%
- Solar	<1%
- Wind	7%
Coal	7%
Large Hydroelectric	3%
Natural Gas	62%
Nuclear	18%
TOTAL	100%

SOURCE: SDG&E October 2010.

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 longterm 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

^{*86} percent of SDG&E 2009 Power Mix is specifically purchased from individual suppliers.

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 use 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 (CO₂ equivalent) by 3 MTCO₂E 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 MMTCO₂E in 2020 and 16.7 MMTCO₂E 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 MMTCO₂E in 2020 and 6.5 MMTCO₂E in 2035. Through implementation of the CAP, the City is projected to reduce emissions even further below targets by 1.2 MMTCO₂E by 2020 and 205,462 MTCO₂E 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 <u>is are</u>-based on <u>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 <u>a significant climate change impacts</u> if it would:</u>

- 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 GHG, 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 MTCO₂E per year screening threshold for determining when an air quality analysis is required was chosen based on available guidance form 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 MTCO₂E of GHGs annually as shown in Table 4.6-1.

TABLE 4.6-1
PROJECT TYPES THAT REQUIRE A GHG ANALYSIS AND MITIGATION

	Project Size that Generates Approximately
Project Type	900 MTCO ₂ E of GHGs per Year
Single Family Residential	50 units
Apartments/Condominiums	70 units
General Commercial Office Space	35,000 square feet
Retail Space	11,000 square feet
Supermarket/Grocery Space	6,300 square feet

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 MTCO₂E.

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 MTCO₂E.

For Phase 1/Phase 2, emission estimates were calculated for the three GHGs of primary concern (CO₂, methane [CH₄], and nitrous oxide [N₂O]) 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
GHG EMISSION FACTORS

	Vehicle	Construction		
	Emission	Equipment	Electricity	Natural Gas
	Factors	Emission Factors	Generation	Combustion
	(pounds/gallon	(pounds/gallon of	Emission Factors	Emission Factors
Gas	gas) ¹	diesel fuel)	(pounds/MWh) ^{4, 5}	(pound/million ft ³) ⁶
Carbon Dioxide	19.564	22.37²	1,340	120,000
Methane	0.00055	0.00128 ³	0.0111	2.3
Nitrous Oxide	0.0002	0.00057 ³	0.0192	2.2

¹SOURCE: BAAQMD 2006.

Transportation-Related Emissions

Phase 2 would generate 58 ADT (see Appendix B). Assuming a regional average trip length of 5.8 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 MTCO₂E 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

²SOURCE: Energy Information Administration, Documentation for Emissions of Greenhouse Gases in the U.S. 2005, DOE/EIA-0638 (2005), October 2007, Tables 6-1, 6-4, and 6-5.

³SOURCE: U.S. Environmental Protection Agency. Inventory of U.S. Greenhouse Gas Emission and Sinks: 1990-2005, EPA 430-R-07-002, Annex 3.2, (April 2007), http://www.epa.gov/climatechange/emission/usinventoryreport.html. Converted from grams per gallon of fuel to pounds per gallon of fuel: CH₄-at 0.58 grams/gallon, N₂0 at 0.26 grams/gallon.

⁴SOURCE: U.S. DOE 2002.

⁶Emissions associated with the embodied energy in water use are calculated using the same emissions factors for electricity generation. ⁶SOURCE: U.S. EPA 1998.

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 MTCO₂E 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 MMTCO₂E 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 MMTCO₂E 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 MTCO₂E. 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 MTCO₂E 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 4.6-3
SUMMARY OF ESTIMATED ANNUAL GHG EMISSIONS AND
PROJECT REDUCTIONS
(MTCO₂E)

	Project Compliant with	Project Design with
Emission Source	Current Building Code	Additional Reductions
Transportation/Vehicles	58.18	41.01 ¹
Electricity Use	37.68	26.38 ²
Natural Gas Use	7.37	7.37
Water Consumption	0.44	0.44
Solid Waste Disposal	1.21	1.21
Construction	18.48	18.48
TOTAL	123.36	94.89

¹GHG 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

²GHG reductions achieved through project-specific design elements that exceed current 2008 Title 24 Energy Efficiency Standards, including: installation of solar PV panels in parking lot.

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?

4.6.4<u>3</u>.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

<u>Checklist</u> (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.

<u>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.</u>

- 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.
- Enhance the pedestrian access, orientation, and walkability within the project site.
- 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 <u>City CAP</u> adopted for the purpose of reducing the emissions of GHG., and ilmpacts 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 the exterior noise standard for 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.

60

75 75

75

One-Hour Average Land Use Sound Level [dB(A) L_{ea}] Time of Day Single Family Residential 7:00 a.m. to 7:00 p.m. 50 7:00 p.m. to 10:00 p.m. 45 10:00 p.m. to 7:00 a.m. 40 Multi-Family Residential 7:00 a.m. to 7:00 p.m. 55 (up to a max. density of 1/2000) 7:00 p.m. to 10:00 p.m. 50 10:00 p.m. to 7:00 a.m. 45 All other Residential 7:00 a.m. to 7:00 p.m. 60 7:00 p.m. to 10:00 p.m. 55 10:00 p.m. to 7:00 a.m. 50 Commercial 7:00 a.m. to 7:00 p.m. 65 7:00 p.m. to 10:00 p.m. 60

10:00 p.m. to 7:00 a.m.

7:00 a.m. to 7:00 p.m.

7:00 p.m. to 10:00 p.m.

10:00 p.m. to 7:00 a.m.

TABLE 4.8-1
APPLICABLE NOISE ORDINANCE LIMITS

d. Construction Noise

Industrial or Agricultural

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 $70.9 \text{ dB}(A) L_{eq}$ 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 the 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) L_{eq} at 3 feet. For a 5-ton unit, the representative noise level of 73 dB(A) L_{eq} 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) L_{eq} 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) L_{eq} 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) L_{eq} at the adjacent residential properties.

TABLE 4.8-2 HVAC NOISE LEVELS [dB(A) L_{eq}]

	HVAC 1	HVAC 2	HVAC 3	Total
Receiver	Noise Level	Noise Level	Noise Level	Noise Level
1	25	25	23	29
2	28	29	28	33
3	27	29	32	35
4	25	27	31	33
5	22	24	27	29
6	21	23	24	28
7	21	23	25	28
8	22	25	25	29
9	22	25	25	29

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 4.8-3
CONSTRUCTION EQUIPMENT

	Maximum Noise Level	Usage	Average Hourly Noise Level at 50 Feet	Average Hourly Noise Level at 100 Feet
Equipment ¹	at 50 Feet [dB(A) L_{eq}] ²	Factor ²	$[dB(A) L_{eq(1)}]$	$[dB(A) L_{eq(1)}]$
Dozer	81.7	40%	77.7	73.7
Loader	79.1	40%	75.1	69.1
Water Truck	76.5	40%	72.5	66.5
Dump Truck	76.5	40%	72.5	66.5
TOTAL			79.8	73.8

SOURCE: Kovtun pers.com. 2010

²SOURCE: 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 $73.8 \text{ dB}(A) L_{\text{eq(1)}}$.

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 4.8-4
FUTURE PROJECTED NOISE LEVELS (CNEL)

Receiver	Location	Projected Noise Level
1	Ground Floor Courtyard	56
2	Ground Floor Courtyard	60
3	Ground Floor Courtyard	59
4	Ground Floor Courtyard	63
5	Northern Entry to Courtyard*	68
6	Second Floor Patio	61

^{*}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.

b. 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

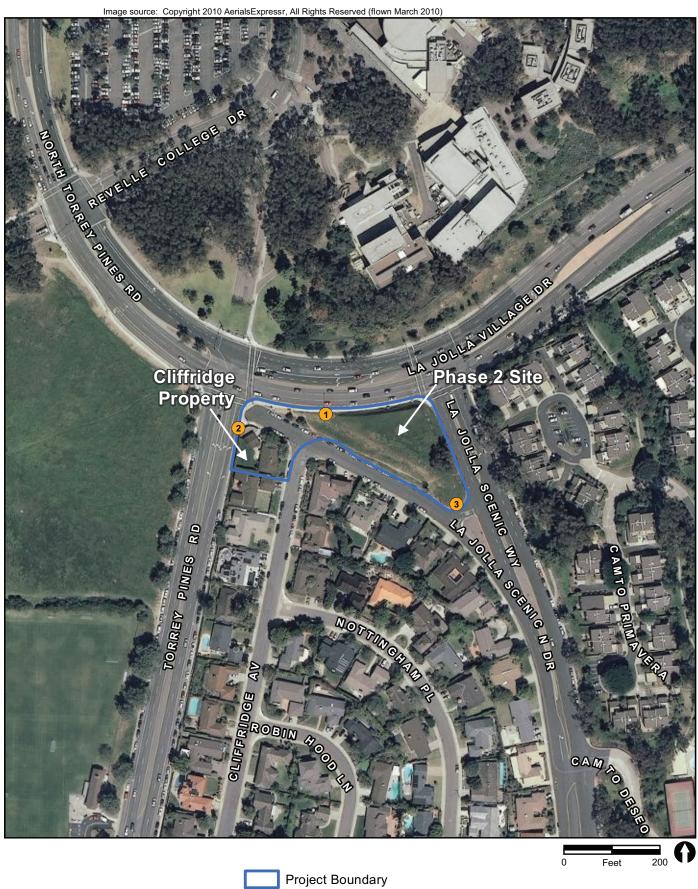
Interior Noise

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

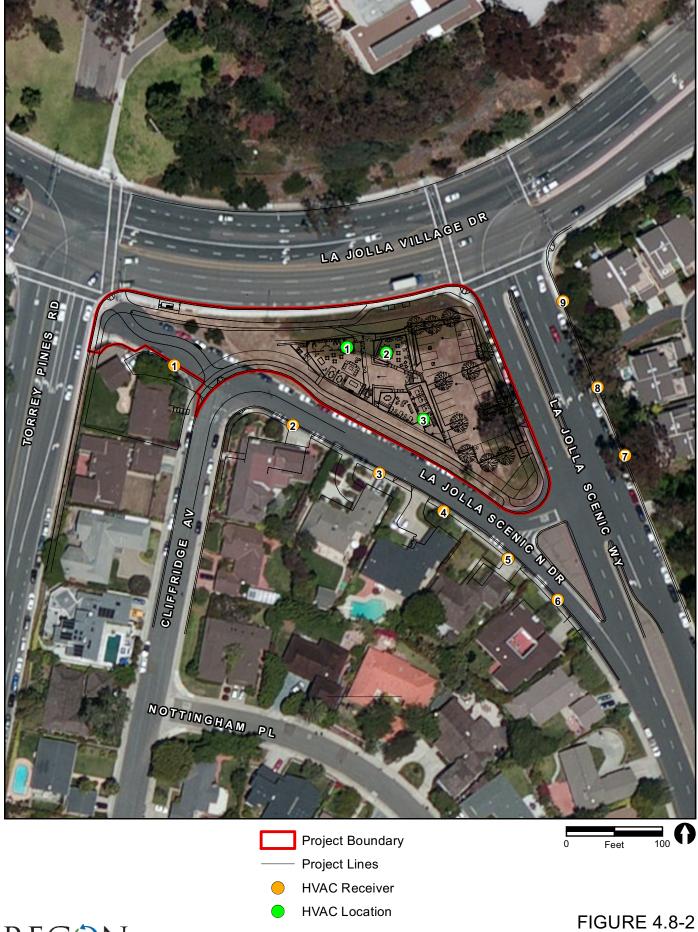
Interior Noise

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.



Noise Measurement Locations

FIGURE 4.8-1

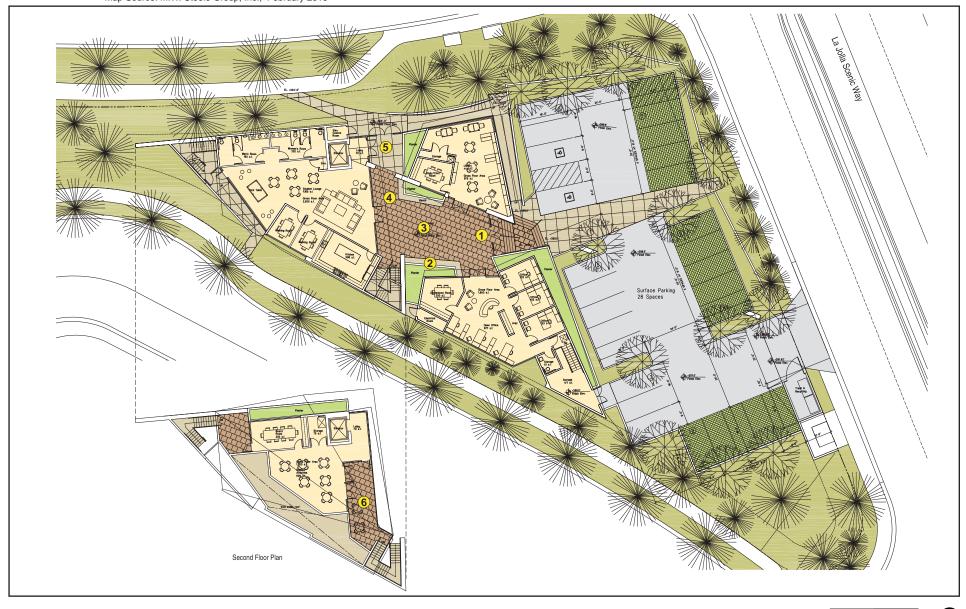


















4.9 Paleontological Resources

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 4.9-1
PALEONTOLOGICAL DETERMINATION MATRIX

Geological Deposit/Formation/Rock Unit	Potential Fossil Localities	Sensitivity Rating
Lindavista Formation (Qln, Qlb) ¹	A. Mira Mesa/Tierrasanta	A. High
	B. All other areas	B. Moderate
Scripps Formation	All communities where this unit occurs	High

SOURCE: City of San Diego CEQA Significance Determination Thresholds, January 2011.

Broadly 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 onsite 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

 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

- 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

- 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 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.
- 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. 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.
- 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)

- 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.

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 projectThe 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 study analyzesd 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 (pervious 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 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. Basin 200 consists of the flow from the public right-of-way along La Jolla Village Drive and La Jolla Scenic Waysurface 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 Hydrology/Drainage

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. result in 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-desac 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 (pervious 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

	Q ₁₀₀	Area
Basin	(cubic feet per second)	(acres)
1	1.10	0.81
2	0.53	0.46
3	0.39	0.15
TOTAL	2.02	1.42

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)

	<u>Areas (acres)</u>		<u>Q₁₀₀ (cfs)</u>		
	Pre-	Post-	Pre-	Post-	
Basin/Node	<u>Development</u>	<u>Development</u>	<u>Development</u>	<u>Development</u>	<u>+/-</u>
<u>100</u>	<u>0.78</u>	<u>0.95</u>	<u>1.48</u>	2.06	+0.58
<u>200</u>	<u>0.42</u>	<u>0.68</u>	<u>0.80</u>	<u>0.68</u>	<u>-0.12</u>
<u>300</u>	0.23	<u>0.17</u>	<u>0.46</u>	<u>0.40</u>	<u>-0.06</u>
<u>Total</u>	1.43	1.43	<u>2.74</u>	<u>3.14</u>	+0.22

SOURCE: Atlas Civil Design 2016.

Q = storm water runoff (see Appendix I for detailed calculations)

cfs = cubic feet per second

TABLE 4.10-2
POST-PROJECT FLOW

	Q ₁₀₀	Area
Basin	(cubic feet per second)	(acre)
A	1.42	0.43
₽	1.16	0.49
C	0.74	0.35
Đ	0.44	0.15
TOTAL	3.76	1.42

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)

	Areas (acres)		<u>Q₁₀₀ (cfs)</u>		
	Pre-	Post-	Pre-	Post-	
Basin/Node	<u>Development</u>	<u>Development</u>	<u>Development</u>	<u>Development</u>	<u>+/-</u>
100	0.78	<u>0.95</u>	<u>1.48</u>	<u>1.36</u>	<u>-0.12</u>
<u>200</u>	<u>0.42</u>	<u>0.68</u>	<u>0.80</u>	<u>0.68</u>	<u>-0.12</u>
100 200 300	0.23	<u>0.17</u>	<u>0.46</u>	<u>0.40</u>	<u>-0.06</u>
<u>Total</u>	<u>1.43</u>	<u>1.43</u>	<u>2.74</u>	3.14	<u>-0.30</u>

SOURCE: Atlas Civil Design 2016.

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. Storm water 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.

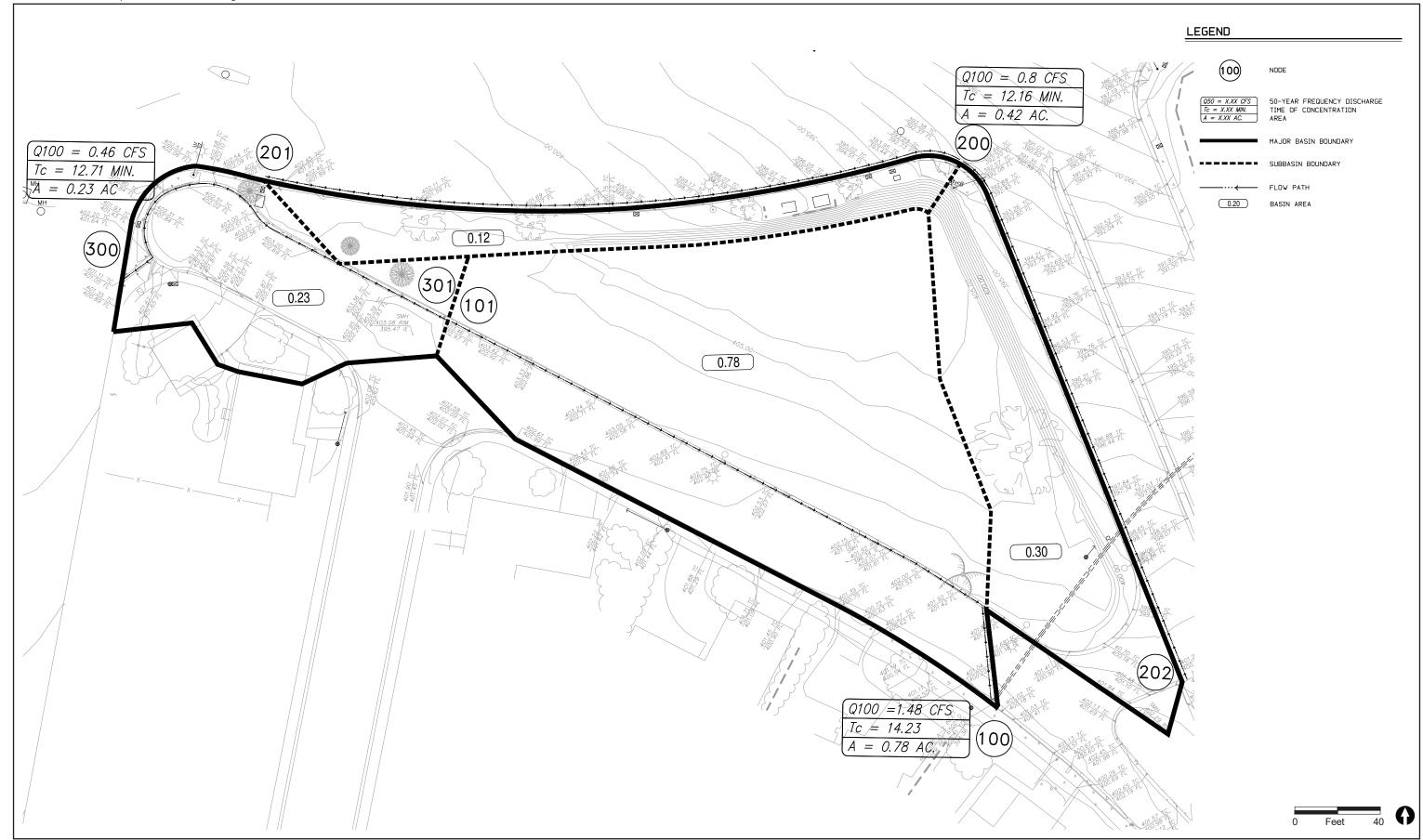
4.10.4.3 Mitigation, Monitoring, and Reporting

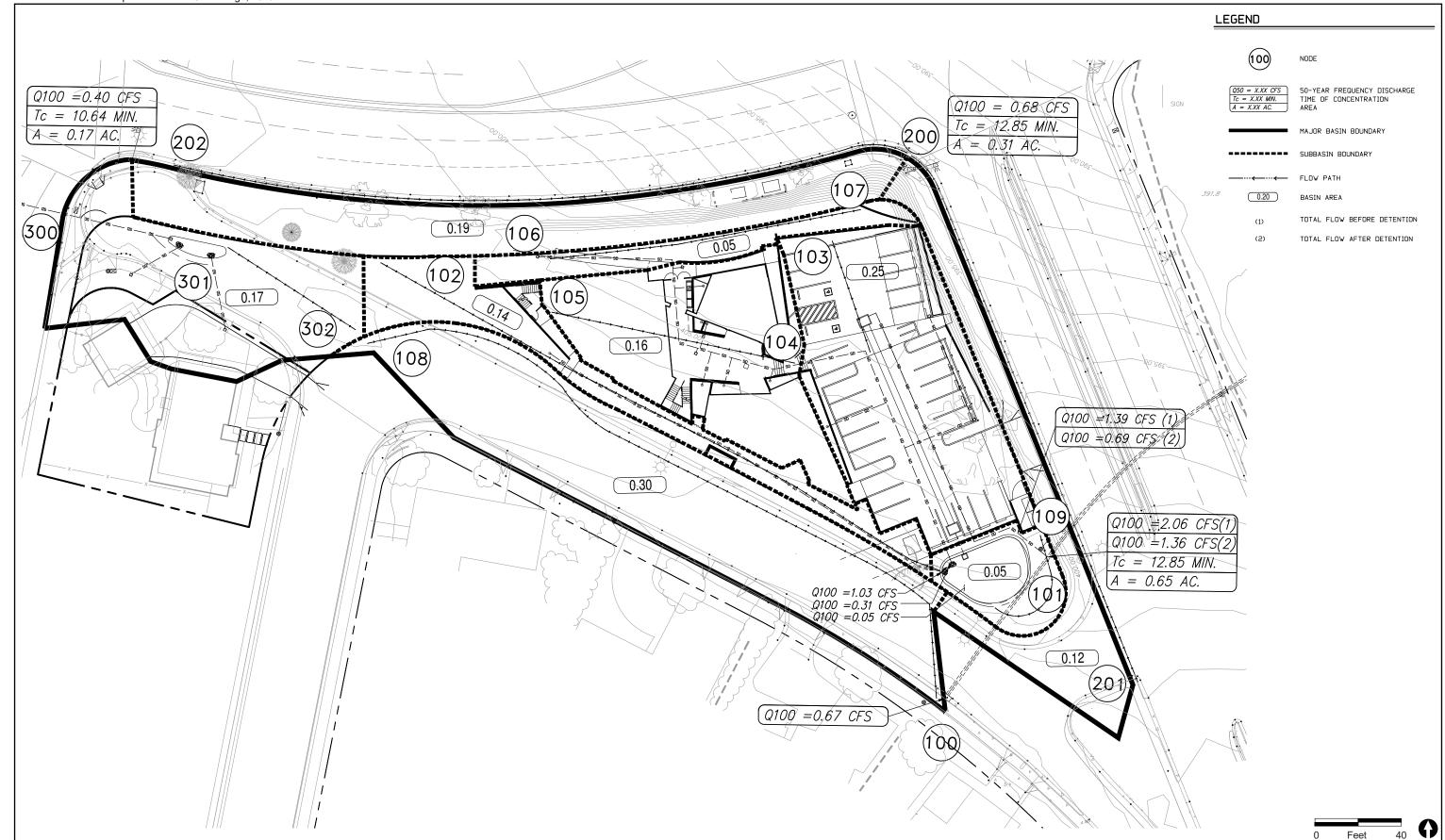
a. Phase 1/Phase 2

No mitigation is required.

b. Existing with Improvements Option

No mitigation is required.





4.11 Water Quality

The following water quality analysis is based upon updated studies since the December 2013 public review of this EIR. on the 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

San Diego Regional Water Quality Control Board (Water Board) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100, NPDES Permit No. CAS0109266

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 2proposed 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:

- 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 designsource 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

quare eetsquare feetPriority 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.

- Routine inspection of the project site before and after events
- Sweeping and cleaning of the project site after each event
- Inspection and maintenance of the landscape and irrigation systems
- Routine inspection of the project site drainage system
- Long-term maintenance of the project site drainage system

The project applicant shall be responsible for the maintenance of all on-site BMPs, including the LID IMPs.

The site, in general, would be inspected before each rainy season. The maintenance schedule would be adjusted as experience dictates to assure that the permanent BMPs function as intended. Inspections should occur after each significant storm. Initial inspection is to occur shortly before the rainy season. Non-structural BMPs such as cleaning and sweeping would be performed on a routine schedule adequate to keep the project site relatively free of silt and trash.

At a minimum, the parking lot would be swept and cleaned on a scheduled monthly basis. Landscape maintenance would be monitored to assure that excess use of fertilizers and pesticides does not occur. Irrigation would be adjusted to avoid runoff. Application of fertilizers and pesticides would be scheduled during the dry season and not prior to anticipated storms. Trimmings and clippings would be gathered and properly disposed of rather than left on the ground to enter the site's drainage system.

b. Existing with Improvements Option

Because the parking lot would be in a location where the garage and deck were once located, there would not be a substantial increase in impervious surfaces and associated runoff. This option would not result in an increase of pollutant discharge. Impacts would be less than significant.

4.11.4.2 Significance of Impacts

a. Phase 1/Phase 2

The design of Phase 1/Phase 2proposed project incorporates features to reduce pollutant storm water discharge off-site, thus avoiding significant runoff water quality. Phase 1/Phase 2The 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.

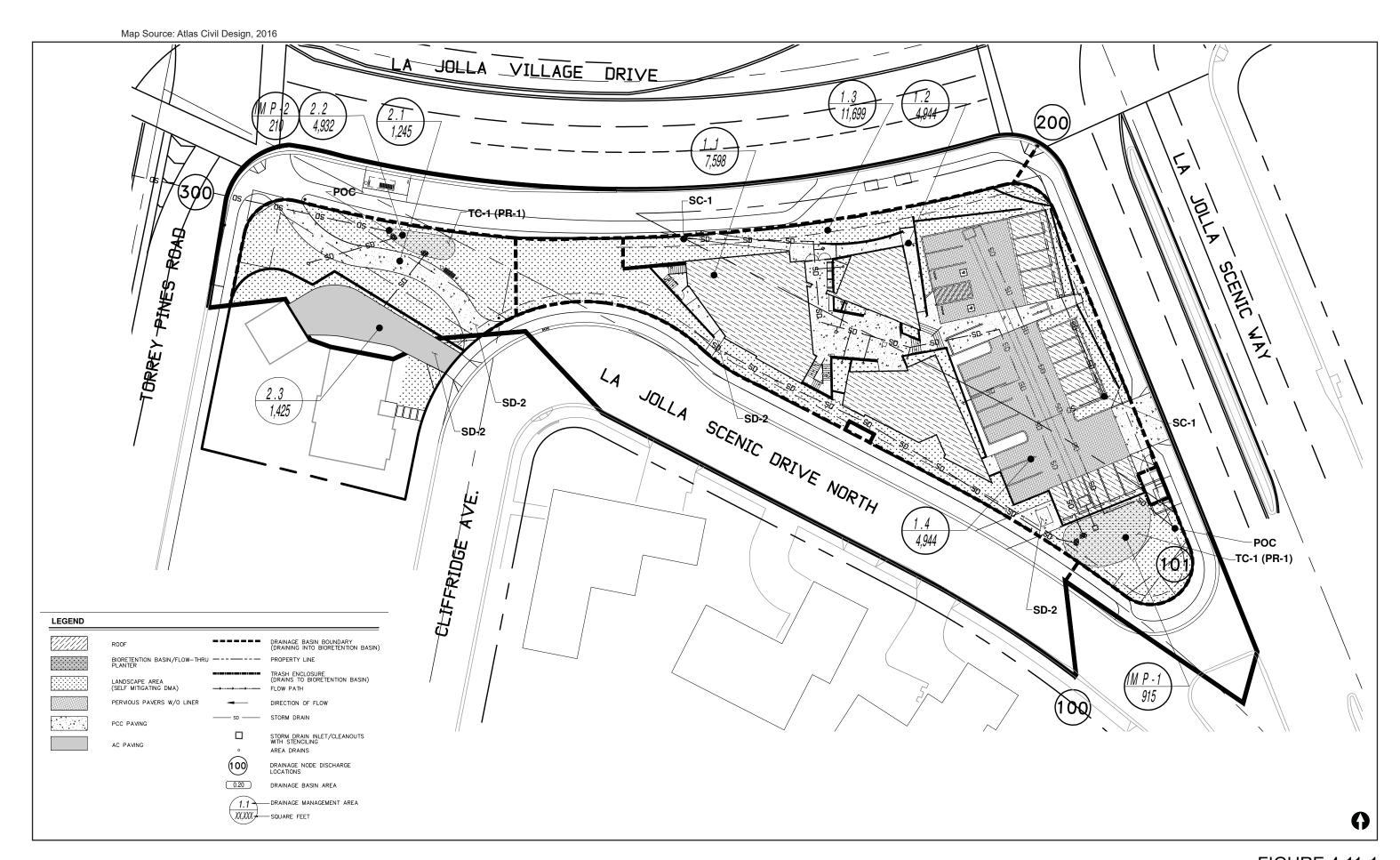
4.11.4.3 Mitigation, Monitoring, and Reporting

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:

- 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-spreading 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 <u>one_the_deviations_identified in Section 3.3</u> being requested from the LDC. Theise deviations is deviations is deviations is deviations.

The One deviation being requested for Phase 1/Phase 2 includes would be 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
NEIGHORHOOD BULK AND SCALE SURVEY

Unit	Building SF	Lot SF	Bedrooms/Baths	Year Built
1				
(Existing Cliffridge Property)	1,740	7,800	3/2	1958
2	2,338	8,000	3/2	1958
3	1,817	8,000	3/2	1959*
4	3,469	8,000	4/4	1970
5	2,424	8,400	4/3	1958
6	1,655	8,000	3/2	1958
7	3,464	9,200	4/4	1980
8	1,818	10,000	3/2	1961
9	2,336	9,800	3/2	1962
10	1,724	8,800	3/2	1960
11	2,458	8,500	4/3	1962
12	2,030	8,000	3/2	1961
13**	3,078	4,970	6/4.5	1974
Average	2,335	8,267		

SF = square feet

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 s havehas a three-car garages. 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

^{*}Original owner

^{**}Two attached, single-family homes considered one structure and one lot area

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 Tthe project would result in a change in site elevation, of steep hillsides and it would not involve mass terracing of natural slopes, with nor 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.

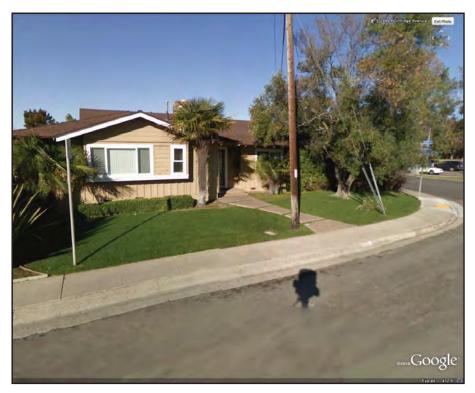
b. Existing with Improvements Option

No mitigation is required.



FIGURE 4.12-1

Overview of Neighborhood Characters



Front of Existing Cliffridge Property



Driveway and Garage of Existing Cliffridge Property

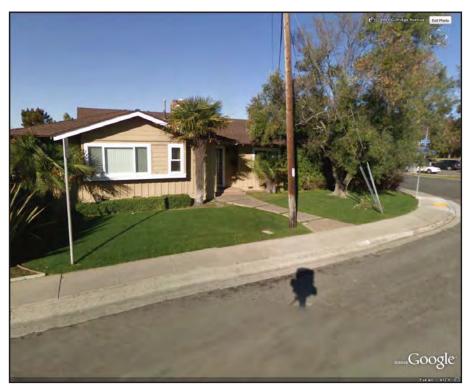
FIGURE 4.12-2 Existing Cliffridge Property





FIGURE 4.12-3

Bulk and Scale Surveyed Residences



Bedroom Residence



Existing La Jolla Scenic Drive North Streetscape



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

FIGURE 4.12-5
Cul de Sac Planned for Improvement



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 quidelines.

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.
- 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 IIIA, or Tier IIIB 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 consistent with local or statepolicies 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 7-1 CUMULATIVE NOISE INCREASE

						Cumulative	Total			
		Existing			Cumulative	Increase	Increase in			
		Plus		Cumulative	Plus	without	Cumulative	Project		
	Existing	Project	Increase	without	Project	Project	with Project	Contribution		
Roadway	ADT	ADT	in dB*	Project ADT	ADT	in dB	in dB	in dB*		
La Jolla Village Drive										
Expedition Way to	32,570.0	32,585.0	0.002	36,680.0	36,695.0	0.5	0.5	0.0		
Torrey Pines Road	32,370.0	32,363.0	0.002	30,000.0	36,693.0	0.5	0.5	0.0		
Torrey Pines Road to	44 700 0	44.040.0	0.000	40.060.0	40.000.0	0.4	0.4	0.0		
La Jolla Scenic Way	44,790.0	44,810.0	0.002	49,060.0	49,080.0	0.4	0.4	0.0		
La Jolla Scenic Way to	49,200.0	40.227.0	0.002	F2 F00 0	F2 C17 O	0.4	0.4	0.0		
Gilman Drive	49,200.0	49,237.0	0.003	53,580.0	53,617.0	0.4	0.4	0.0		
Torrey Pines Road										
La Jolla Village Drive to	26,740.0	26,746.0	0.001	27,440.0	27,446.0	0.1	0.1	0.0		
Glenbrook Way	26,740.0	20,740.0	0.001	27,440.0	27,440.0	0.1	0.1	0.0		
La Jolla Scenic Way										
La Jolla Villa Drive to										
La Jolla Scenic Drive	10,090.0	10,148.0	0.025	10,380.0	10,438.0	0.1	0.1	0.0		
North										
La Jolla Scenic Drive										
North										
Cliffridge Avenue to	1 220 0	1 221 0	0.002	1 250 0	1 251 0	0.1	0.1	0.0		
La Jolla Scenic Way	1,320.0	1,321.0	0.003	1,350.0	1,351.0	0.1	0.1	0.0		

*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, architecture, 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

7.0 Cumulative Impacts

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 tThe 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.

TABLE 8-1
SUMMARY OF WORST-CASE CONSTRUCTION EMISSIONS
(pounds per day)

Pollutant	Year 2012	SDAPCD Significance Thresholds ²
ROG	7	137
NO_x	22	250
CO	12	550
SO _x ¹	0	250
PM ₁₀ Dust	5	100
PM ₁₀ Exhaust	1	_
PM_{10}	6	_
PM _{2.5} Dust	1	55
PM _{2.5} Exhaust	1	_
PM _{2.5}	2	

¹Emissions calculated by URBEMIS 2007 are for SO₂.

TABLE 8-2
PROJECT (YEAR 2012) AVERAGE DAILY EMISSIONS TO THE SAN DIEGO AIR BASIN (pounds/day)

Season	Pollutant	Area Source Emission	Operational (Vehicle) Emission	Total Emission	SDAPCD Significance Threshold ²
Summer	ROG	0.16	0.27	0.43	137
	NOx	0.06	0.33	0.39	250
	CO	1.59	2.91	4.50	550
	SOx ¹	0.00	0.00	0.00	250
	PM_{10}	0.01	0.58	0.59	100
	$PM_{2.5}$	0.01	0.11	0.12	55
Winter	ROG	0.04	0.27	0.31	137
	NOx	0.04	0.39	0.43	250
	CO	0.04	2.85	2.89	550
	SOx ¹	0.00	0.00	0.00	250
	PM_{10}	0.00	0.58	0.58	100
	$PM_{2.5}$	0.00	0.11	0.11	55

Note: Totals may vary due to independent rounding.

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.

²Threshold for PM_{2.5} was obtained from the SCAQMD

¹Emissions calculated by URBEMIS 2007 are for SO₂.

²Threholds for ROG and PM_{2.5} were obtained from the SCAQMD.

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 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 tThe Phase 1/Phase 2 project nor the Existing with Improvements optionwould not require that recreational facilities to be constructed; thus, no impact to recreational resources would occur.

8.6 Utilities and Service Systems

Neither tThe Phase 1/Phase 2 project nor the Existing with Improvements optionwould 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 tThe Phase 1/Phase 2 project nor the Existing with Improvements optionwould 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, communitybuilding, 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 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 <u>Alternative eption</u>-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, uUnder 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-desac (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 generated 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

			Existing With Current Zoning		Existing With Improvements		
<u>Intersection</u>	Control Type	<u>Peak</u> _ <u>Hour</u>	<u>Delay^a</u>	LOS ^b	<u>Delay</u>	LOS	
1. La Jolla Village Drive/	Signal	AM	<u>21.6</u>	<u>C</u>	<u>21.6</u>	<u>C</u>	
Torrey Pines Road		PM	<u>33.1</u>	C	<u>33.1</u>	C	
 La Jolla Village Drive/	<u>Signal</u>	<u>AM</u>	<u>15.2</u>	<u>В</u>	<u>15.2</u>	<u>В</u>	
La Jolla Scenic Way		<u>PM</u>	<u>20.8</u>	С	20.8	С	
3. La Jolla Scenic Drive	OWSC ^c	<u>AM</u>	<u>8.6</u>	<u>A</u>	<u>8.6</u>	<u>A</u>	
North/ Cliffridge Way		<u>PM</u>	<u>8.6</u>	<u>A</u>	<u>8.6</u>	<u>A</u>	
4. La Jolla Scenic Way/ La	<u>OWSC</u>	<u>AM</u>	<u>14.1</u>	<u>A</u>	<u>14.1</u>	<u>А</u>	
Jolla Scenic Drive North		<u>PM</u>	<u>12.2</u>	<u>B</u>	<u>12.3</u>	В	
5. La Jolla Scenic Drive	Uncontrolled d	<u>AM</u>	<u>13.7</u>	<u>В</u>	<u>13.7</u>	<u>B</u>	
North/ Caminito Deseo		<u>PM</u>	<u>12.6</u>	В	<u>12.7</u>	B	

^aAverage delay expressed in seconds per vehicle

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.

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 Deseo was analyzed as the minor street stop-controlled movement since vehicles utilizing this movement were observed to stop.

TABLE 4.2-129-2 EXISTING WITH IMPROVEMENTS OPTION ALTERNATIVE - SEGMENT OPERATIONS

	Functional LOS E		Existing With Current Zoning			Existing With Improvements		
Street Segment	Classification	Capacity ^a	ADT ^b	LOS °	V/C d	ADT	LOS	V/C
La Jolla Village Drive								
Expedition Way to Torrey Pines Road	4-Ln Major Arterial	40,000	32,566	D	0.814	32,570	D	0.814
Torrey Pines Road to La Jolla Scenic Way	6-Ln Major Arterial	45,000 ^g	44,785	Ε	0.995	44,790	Е	0.995
La Jolla Scenic Way to Gilman Drive	6-Ln Prime Arterial	60,000	49,200	С	0.820	49,209	С	0.820
Torrey Pines Road								
La Jolla Village Drive to Glenbrook Way	4-Ln Collector	30,000	26,739	Ε	0.891	26,740	Ε	0.891
La Jolla Scenic Way								
La Jolla Village Drive to La Jolla Scenic Drive North	2-Ln Collector	15,000 ^e	10,084	D	0.672	10,099	D	0.673
La Jolla Scenic Drive North								
Cliffridge Avenue to La Jolla Scenic Way	Sub-Collector	2,200 [†]	1,350	≥C	N/A	1,351	≥C	N/A

^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 Élement Residential Collector capacity of LOS C threshold of 2,200 was utilized.

⁹La 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 with only minor disturbance to biological resources under the Existing with Improvements Alternative, impacts would be less than the 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 is—has a GFA of 1,792 square feet (GFA)—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.

9.2.1.6 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.

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, taraffic volumes would not increase with the Existing with Improvements optionAlternative 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 to 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

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 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. 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 optionAlternative; 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 optionthe 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 measureable 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 Ilessen 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 2proposed 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. <u>Development Features</u>

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.

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 <u>Cliffridge</u> property would revert to a single-family residence, which is an allowed use in the zone. The <u>code violation would be removed from the site.</u> existing land uses would remain. The code violation related to the site use would require resolution with the <u>City</u>, but land use-related impacts would be less than significant and similar to Phase 1/Phase 2.

Comparison of Impact to Land Use

<u>Under the No Project Alternative, the proposed use would be allowed under the zone. Impacts</u> 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 <u>proposed</u> 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 <u>no</u> construction activities; therefore, short-term disruption to raptors and breeding or nesting birds would not occur<u>and impacts would be less than significant</u>. 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 the No Project Alternative would not-result in an increase in the less 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. ever 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

<u>Due to the absence of construction and the reduced intensity of use under the No Project</u> Alternative, <u>because there would be no development of the site under the No Project Alternative</u>, 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 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 94.89 MTCO₂E each year by 2020.

Under the No Project Alternative, the <u>use would be consistent with relevant land use plans and therefore consistent with the City CAP.</u> re 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 <u>No</u> new GHG emissions <u>would be added</u> 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, ilmpacts 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

<u>No</u> 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. However, under the No Project Alternative there would not be any potential loss of resources.

Comparison of Impacts to Paleontological Resources

<u>Therefore, impacts to paleontological resources would be</u> <u>Because there would be no grading under the No Project Alternative, impacts are considered less than the Phase 1/Phase 2 project.</u>

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 <u>either the</u> Phase 1/Phase 2 <u>projector the No Project Alternative</u>, because there would be no change in hydrology under this alternative, impacts would be <u>considered</u> less than <u>the Phase 1/Phase 2 project</u>.

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 to 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 lessen-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 <u>associated with the No Project Alternative</u> 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 majorany 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, iNo 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, ilmpacts 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 cConstraints 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, ilmpacts from geologic hazards associated with the Reduced Project Alternative would be the same similar compared to the as-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, tThe 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.

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 <u>general construction</u> impacts as <u>the</u> Phase 1/Phase 2 <u>project</u>. 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. <u>Impacts to historical resources under this alternatives would be less than significant.</u>

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, ilmpacts 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, Garading 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

<u>Although the However,</u> Phase 1/Phase 2 <u>project</u> would <u>have no not result in significant visual impacts, due to . Tthis alternative's reduced scale, would have less visual impacts <u>would be less than the proposed project.</u> due to the increase in landscaped areas compared to that of the project.</u>

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 a—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 assimilar 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 <u>could_would_result</u> in significant impacts. In addition, short-term disruption to raptors and breeding or nesting birds <u>could_would_occur</u> under the Site 675 Alternative as a result of construction activities. <u>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.</u>

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 Tthe Site 675 Alternative would result inbe greater impacts to biological resources—than the Phase 1/Phase 2 due to the relatively undisturbed nature of the vegetation and steep slopesproject.

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, cCompliance with the most recent building codes would reduce any significant impacts from the Site 675 Alternative, and impacts would be the same assimilar 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 would 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 assimilar 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, iDue to compliance with the City CAP, mimpacts resulting from associated with GHG emissions under and 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, d_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, pPrior 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, ilmpacts 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 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 tThis 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 <u>Visual impacts under the Site 675</u> Alternative would result in <u>be</u> similar visual impacts compared to Phase 1/Phase 2 <u>project</u>. 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, andnoise, 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.

TABLE 9-34
MATRIX COMPARISON OF THE PHASE 1/PHASE 2 PROJECT AND ALTERNATIVES

F : (11		Fig. 30.1		D	
Environmental Issue		Existing with Improvements		Reduced Project Footprint on	<u> </u>
Area	Phase 1/Phase 2	<u>Alternative</u> Option	No Project Alternative	Vacant Parcel Alternative	Site 675 Alternative
Land Use		Less than Similar as	Same - <u>Similar</u> as		
	No significant impacts	Phase 1/Phase 2	Phase 1/Phase 2	Same Similar as Phase 1/Phase 2	Similar Same as Phase 1/Phase 2
Traffic/Circulation		Less than Similar as	Less than Similar as		
	No significant impacts	Phase 1/Phase 2	Phase 1/Phase 2	Same Similar as Phase 1/Phase 2	Similar Same as Phase 1/Phase 2
Biological Resources	Significant impacts mitigated				Similar Greater than as Phase
_	to below level of significance	Less than Phase 1/Phase 2	Less than Phase 1/Phase 2	Same Similar as Phase 1/Phase 2	1/Phase 2
Geology and Soils	-	Less thanSimilar as	Less thanSimilar as		
	No significant impacts	Phase 1/Phase 2	Phase 1/Phase 2	Same Similar as Phase 1/Phase 2	SimilarSame as Phase 1/Phase 2
Energy	-			Same as Less than Phase 1/	
	No significant impacts	Less than Phase 1/Phase 2	Less than Phase 1/Phase 2	Phase 2	SimilarSame as Phase 1/Phase 2
Global Climate	-	Less thanSimilar as	Less thanSimilar as	Same Similar as Phase 1/ Phase	Similar Greater than as
Change	No significant impacts	Phase 1/Phase 2	Phase 1/Phase 2	2	Phase 1/Phase 2
Cultural/			Same-Similar as		
Historic Resources	No significant impacts	Same as Phase 1/Phase 2	Phase 1/Phase 2	SimilarSame as Phase 1/Phase 2	SimilarSame as Phase 1/ Phase 2
Noise	Significant impacts mitigated	Same as Less than			
	to below level of significance	Phase 1/Phase 2	Less than Phase 1/Phase 2	SimilarSame as Phase 1/Phase 2	SimilarSame as Phase 1/Phase 2
Paleontological	Significant impacts mitigated				
Resources	to below level of significance	Less than Phase 1/Phase 2	Less than Phase 1/Phase 2	SimilarSame as Phase 1/ Phase 2	SimilarSame as Phase 1/ Phase 2
Hydrology		Less thanSimilar as		Similar as Less than Phase	Similar Greater than as
	No significant impacts	Phase 1/Phase 2	Less than Phase 1/Phase 2	1/Phase 2	Phase 1/Phase 2
Water Quality		Less than Similar		Similar Less than as Phase	
•	No significant impacts	Phase 1/Phase 2	Less than Phase 1/Phase 2	1/Phase 2	SimilarSame as Phase 1/Phase 2
Visual Effects and	-				
Neighborhood					
Character	No significant impacts	Less than Phase 1/Phase 2	Less than Phase 1/Phase 2	Less than Phase 1/Phase 2	Similar Same as Phase 1/Phase 2









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, is 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 costeffective 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.
- 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:

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST							
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes					
General	Consultant Qualification Letters	Prior to Preconstruction Meeting					
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting					
Biology	Biologist Limit of Work Verification	Limit of Work Inspection					
Biology	Biology Reports	Biology/Habitat Restoration Inspection					
Paleontology	Paleontology Reports	Paleontology Site Observation					
Noise	Acoustical Reports	Noise Mitigation Features Inspection					
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter					

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 <u>the Phase 1/Phase 2 project or the Existing with Improvements option are properly implemented.</u> All the mitigation measures identified in the EIR are stated herein.

TABLE 10-1 MITIGATION MONITORING AND REPORTING PROGRAM FOR <u>THE PHASE 1/PHASE 2 AND EXISTING WITH IMPROVEMENTS OPTION PROJECT</u>

Potential Significant Impact	Mitigation Measures	Time Frame of Mitigation	Monitoring Reporting Agency
PHASE 1/PHASE 2 PROJECT			
Exterior noise levels are projected to exceed 60 CNEL; hence, interior noise levels could exceed 45 CNEL. Interior noise impacts are potentially significant.	NOS-1: 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.	Prior to the issuance of building permits	City
	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.		
	NOS-2: The design for the proposed buildings shall include a ventilation or air conditioning system to provide a habitable interior environment when windows are closed.		

Potential Significant Impact	Mitigation Measures	Time Frame of Mitigation	Monitoring Reporting Agency
PHASE 1/PHASE 2 PROJECT			
BIOLOGICAL RESOURCES			
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.	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 (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.	Prior to the issuance of a grading permit	City

Potential Significant Impact	Mitigation Measures	Time Frame of Mitigation	Monitoring Reporting Agency
Phase 1/Phase 2 Project			
PALEONTOLOGICAL RESOURCES			
	PALEO-1: The project shall follow the procedures outlined below as 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 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	Prior to the issuance of any construction permit	City
	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,

Potential Significant Impact	Mitigation Measures	Time Frame of Mitigation	Monitoring Reporting Agency
	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.		
В.	PI Shall Attend Precon Meetings		
	 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).		

Potential Significant Impact		Mitigation Measures	Time Frame of Mitigation	Monitoring Reporting Agency
	3.	When Monitoring Will Occur		
		 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	g Construction		
	A. M	onitor Shall be Present During Grading/Excavation/Trenching		
		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.		

Potential Significant Impact		Mitigation Measures	Time Frame of Mitigation	Monitoring Reporting Agency
	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.		
В	Di	scovery 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	De	etermination 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		

Potential Significant Impact		Mitigation Measures	Time Frame of Mitigation	Monitorin Reporting Agency
		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 a	d/or Weekend Work		
	A. If n	ht and/or weekend work is included in the contract:		
	1.	When night and/or weekend work is included in the contract backage, 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.		
		o. 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.		

Potential Significant Impact		Mitigation Measures	Time Frame of Mitigation	Monitoring Reporting Agency
	В.	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.		
•	/. Po	est Construction		
	A.	Preparation and Submittal of Draft Monitoring Report		
		 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. 		
		 For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report. 		
		 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.		
		MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.		
		The PI shall submit revised Draft Monitoring Report to MMC for approval.		

Potential Significant Impact		Mitigation Measures	Time Frame of Mitigation	Monitoring Reporting Agency
	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. I	Handling of Fossil Remains		
	•	 The PI shall be responsible for ensuring that all fossil remains collected are cleaned and catalogued. 		
	2	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.		
		Curation of Fossil Remains: Deed of Gift and Acceptance Verification		
	•	 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. I	Final Monitoring Report(s)		
		 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. 		
C	opy of t	shall, in no case, issue the Notice of Completion until receiving a he approved Final Monitoring Report from MMC which includes eptance Verification from the curation institution.		

Potential Significant Impact	Mitigation Measures	Time Frame of Mitigation	Monitoring Reporting Agency
EXISTING WITH IMPROVEMENTS			
NOISE			
Exterior noise levels are projected to exceed 60 CNEL; hence, interior noise levels could exceed 45 CNEL. Interior noise impacts are potentially significant.	NOS-3 Prior to the issuance of building permits, a detailed acoustica analysis shall demonstrate that interior noise levels within the Cliffridge property due to exterior sources would be at or below the 45 CNEL standard.	issuance of	City
	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 ai		
	conditioning system to provide a habitable interior environmen when windows are closed.	ŧ	

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

2010 Spring 2010 Advanced CEQA Workshop. San Diego Chapter. May 13.

Atlas Civil Design

2016 Drainage Study for UCSD Hillel Center. November 18.

Bay Area Air Quality Management District (BAAQMD)

2006 Source Inventory of Bay Area Greenhouse Gas Emissions. November.

California, State of

2010 Natural Diversity Data Base. Nongame-Heritage Program, California Department of Fish and Game, Sacramento.

California Air Resources Board (CARB)

- 2008a Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California environmental Quality Act. Preliminary Draft Staff Proposal. October 24.
- 2008b California 2020 GHG Emissions Forecast. Accessed June 1, 2010 from the CARB website at http://www.arb.ca.gov/cc/inventory/data/forecast.htm. Last updated October 2008; last reviewed May 28, 2010.

California Department of Resources Recycling and Recovery (CalRecycle)

2009 Estimated Solid Waste Generation Rates for Educational Uses. Accessed from the CalRecycle website at http://www.calrecycle.ca.gov/wastechar/wastegenrates. Updated December 30.

Deméré and Walsh

1994 Paleontological Resources, County of San Diego. Thomas A. Deméré and Stephen L. Walsh, Department of Paleontology, San Diego Natural History Museum. August 1994.

Federal Highway Administration (FHWA)

2006 Roadway Construction Noise Model (RCNM). Prepared by U.S. Department of Transportation. Version 1.00. February 2.

Holland, Robert F.

1986 Preliminary Descriptions of the Terrestrial Natural Communities of California.

Nongame-Heritage Program, California Department of Fish and Game. October.

Kovtun, Gordon

2010 Personnel communication with Lisa Lind, RECON, via email. Principal, KCM Group. October 25.

Linscott, Law & Greenspan, Engineers

2012 Traffic Impact Analysis for the Hillel Facility. LLG Ref. 3-08-1807. January 11.

2011 Traffic Impact Analysis for the UCSD Hillel Center for Jewish Life. January 6.

Paul Design Group

— 2011a Preliminary Hydrology and Hydraulic Study for Hillel Property, 9000 La Jolla Scenic Way. February 2.

2011b Preliminary Water Quality Technical Report for Hillel of U.C.S.D. January 31.

Regional Water Quality Control Board (RWQCB)

1994 Water Quality Control Plan for the San Diego Basin. September.

Reiser, Craig

2001 Rare Plants of San Diego County. Aquafir Press. 245 pp.

Rimpo and Associates

2007 URBEMIS 2007 for Windows, Version 9.2.4.

San Diego Association of Governments (SANDAG)

- 2009 Transportation: Roads and Highways. Accessed from the SANDAG website at http://www.sandag.org/index.asp?subclassid=10&fuseaction=home.subclasshome. November 13.
- 2010 Greenhouse Gas Reduction Targets Set. News story accessed from the SANDAG website at http://www.sandag.org/index.asp?newsid=666&fuseaction=news.detail on October 29.

- San Diego, City of
 - 1995 Seismic Safety Study.
 - 2000 Memorandum regarding Site 653/APN 344-120-26 in La Jolla. From Marcia McLatchy, Director of Park and Recreation Department, to Shahriar Afshar, Real Estate Assets Department. November 17.
 - 2001a Biology Guidelines. Land and Development Manual. May.
 - 2001b Historical Resource Guidelines.
 - 2002 Guidelines for Conducting Biological Surveys. July.
 - 2005 Environmental Impact Report Guidelines. December.
 - 2011 Significance Determination Guidelines Under the California Environmental Quality Act. Planning and Development Review, Land Development Review Division, Environmental Analysis Section. July.
 - 2008a Historic Preservation Element, March.
 - 2008b General Plan. March 10.
 - 2011a Stormwater Standards Manual. Accessed online. http://www.sandiego.gov/development-services/news/pdf/stormwatermanual.pdf
 - 2011b San Diego Fire-Rescue Department: About SDFRD. http://www.sandiego.gov/fireandems/about/sta9.shtml. Accessed February 8.

San Diego Regional Water Quality Control Board

1995 The Water Quality Control Plan for the San Diego Basin 9 (Basin Plan). Accessed online 2/10/11. http://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/index.shtml

Silverman, Dennis

2007 Southern California Household Energy Savings. University of California at Irvine study. Accessed online July 24, 2012. http://www.physics.uci.edu/~silverma/actions/HouseholdEnergy.html

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)

2010 Integrated Report (Clean Water Act Section 303(d) List / 305(b) Report. Accessed online. http://www.swrcb.ca.gov/water_issues/programs/tmdl/ integrated2010.shtml

Torcellini, P., Long, N., and Judkoff, R.

2003 Consumptive Water Use for U.S. Power Production. Technical Report # NREL-TP-550-33905. National Renewable Energy Laboratory. Golden, CO.

United States Department of Energy (U.S. DOE)

2002 Updated State-level Greenhouse Gas Emission Coefficients for Electricity Generation 1998-2000. Energy Information Administration, Office of Integrated Analysis and Forecasting, Energy Information Administration. April. Obtained from the DOE website at http://tonto.eia.doe.gov/FTPROOT/environment/e-supdoc-u.pdf on February 16, 2007.

United States Energy Information Administration (U.S. EIA)

Table 5, Average Monthly Bill by Census Division, and State 2008. Accessed from the U.S. EIA website at http://www.eia.doe.gov/cneaf/electricity/ esr/table5.html. January.

United States Environmental Protection Agency (U.S. EPA)

- 1998 AP 42, Fifth Edition, Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Section 1.4, Natural Gas Combustion. July.
- 2002 Greenhouse Gases and Global Warming Potential Values Excerpt from the Inventory of U.S. Greenhouse Emissions and Sinks: 1990-2000. U.S. Greenhouse Gas Inventory Program, Office of Atmospheric Programs. April.

12.0 Individuals <u>I and Agencies Consulted</u> and <u>Certification</u>

12.1 Individuals and Agencies Consulted

Agencies and individuals contacted during preparation of the EIR include the following:

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- Elizabeth Shearer-Nguyen, Associate Planner

12.213.0 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.

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Paul Design Group

Preliminary Hydrology and Hydraulic Study

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Preliminary Water Quality Technical Report

• Bradley D. Sager, PE