



THE CITY OF SAN DIEGO

DEVELOPMENT SERVICES DEPARTMENT

Date of Notice: April 4, 2016

PUBLIC NOTICE OF THE PREPARATION OF A SUBSEQUENT ENVIRONMENTAL IMPACT REPORT AND SCOPING MEETING

SAP No. 24005737

PUBLIC NOTICE: The City of San Diego as the Lead Agency has determined that the project described below will require the preparation of a Subsequent Environmental Impact Report (SEIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a project SEIR and Scoping Meeting was publicly noticed and distributed on April 6, 2016. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego website at: <http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml> under the "California Environmental Quality Act (CEQA) Notices & Documents" section. In addition, the Public Notice was also distributed to the Central Library, as well as to the Linda Vista Branch Library.

SCOPING MEETING: A public scoping meeting will be held by the City of San Diego's Development Services Department on **April 20, 2016, beginning at 6:00 PM and running no later than 8:00 PM at the University of San Diego Kroc Institute for Peace and Justice (KIPJ), Room A, 5998 Alcalá Park Drive, San Diego, CA 92110. Please note that depending on the number of attendees, the meeting could end earlier than 8:00 PM.** Verbal and written comments regarding the scope and alternatives of the proposed SEIR will be accepted at the meeting.

Written comments may be sent to the following address: **L. Sebastian, Environmental Planner, City of San Diego Development Services Department, 1222 First Avenue, MS 501, San Diego, CA 92101** or submitted via e-mail to DSDEAS@sandiego.gov with the Project Name and Number in the subject line within 30 days of the receipt of this notice. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. A SEIR incorporating public input will then be prepared and distributed for the public to review and comment.

GENERAL PROJECT INFORMATION:

- **PROJECT NAME / NUMBER:** USD MASTER PLAN UPDATE / 417090
- **COMMUNITY AREA:** Linda Vista
- **COUNCIL DISTRICT:** 2

DESCRIPTION: The project proposes a CONDITIONAL USE PERMIT (CUP) to amend CUP/Resource Protection Ordinance (RPO) Permit No. 92-0568, CUP No. 40-0419, CUP No. 10325 (Project No. 6242) and CUP No. 489856 (Project No. 140201) for development/improvements to the existing university. The CUP is also required for the existing/proposed student dormitories and child care center. A SITE DEVELOPMENT PERMIT (SDP) to amend SDP No. 10326 (Project No. 6242) and CUP/RPO Permit No. 92-0568 for development on a site that contains Environmentally Sensitive Lands (ESL), and for deviations to the zoning regulations. Specifically, the project would provide a comprehensive revision of the 1996 Master Plan and Design Guidelines, as well as the campus' building space and infrastructure needs associated with increasing enrollment from 7,000 full-time equivalent students (FTE) to 10,000 FTE students over the next 20+ years. The USD Master Plan Update project would allow for the development of academic core/student service/support uses and

athletics and recreation uses, and additional student housing. Parking supply expansions would also occur under the proposed Master Plan Update. The RPO Deed Restriction may be modified if the City determines the Deed Restriction is no longer needed because of new protective environmental regulatory requirements (i.e., MSCP Subarea Plan and ESL Regulations) enacted since the 1996 Master Plan and RPO Permit were approved. Among the projects outlined in the Master Plan Update are 14 proposed construction sites, as well as 16 approved projects identified in the 1996 Master Plan EIR that have previous City review/approvals but remain unbuilt. The 14 proposed project sites would allow for the construction of academic/administrative buildings, student housing, student services uses, athletics/athletic support/administrative buildings, parking, pedestrian circulation and landscape improvements not contemplated in the 1996 Master Plan and related EIR. Design guidelines contained in the Master Plan Update would provide a comprehensive design framework to guide campus development. Other elements of the Master Plan Update address the planning context of the campus, provide an enrollment and space analysis, and identify sustainability goals. The project would obtain a Leadership in Energy and Environmental Design (LEED) Silver Certification, in conformance with the criteria of the Affordable/In-Fill Housing and Sustainable Buildings Expedite Program. The approximate 180-acre project site is located at 5998 Alcalá Park. The parcel is designated Institution within the Linda Vista Community Plan. The site is within the OR-1-1, RS-1-7, RM-1-1, RM-3-7, and CC-4-2 Zones. Additionally, the project site is within the Community Plan Implementation Overlay Zone CPIOZ (Type A), the Parking Impact Overlay Zone (Campus Impact Area), the Airport Influence Area for San Diego International Airport and Montgomery Field (Review Area 2), the Airport Land Use Compatibility Overlay Zone, and the Federal Aviation Administration (FAA) Part 77 Noticing Area. (Assessor Parcel Number (APN) 436-280-1300) **The site is not included on any Government Code listing of hazardous waste sites.**

APPLICANT: Ky Snyder, University 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, Biological Resources, Historical Resources, Air Quality, Hydrology/Water Quality, Public Utilities, Visual Effects/Neighborhood Character, and Cumulative Effects.**

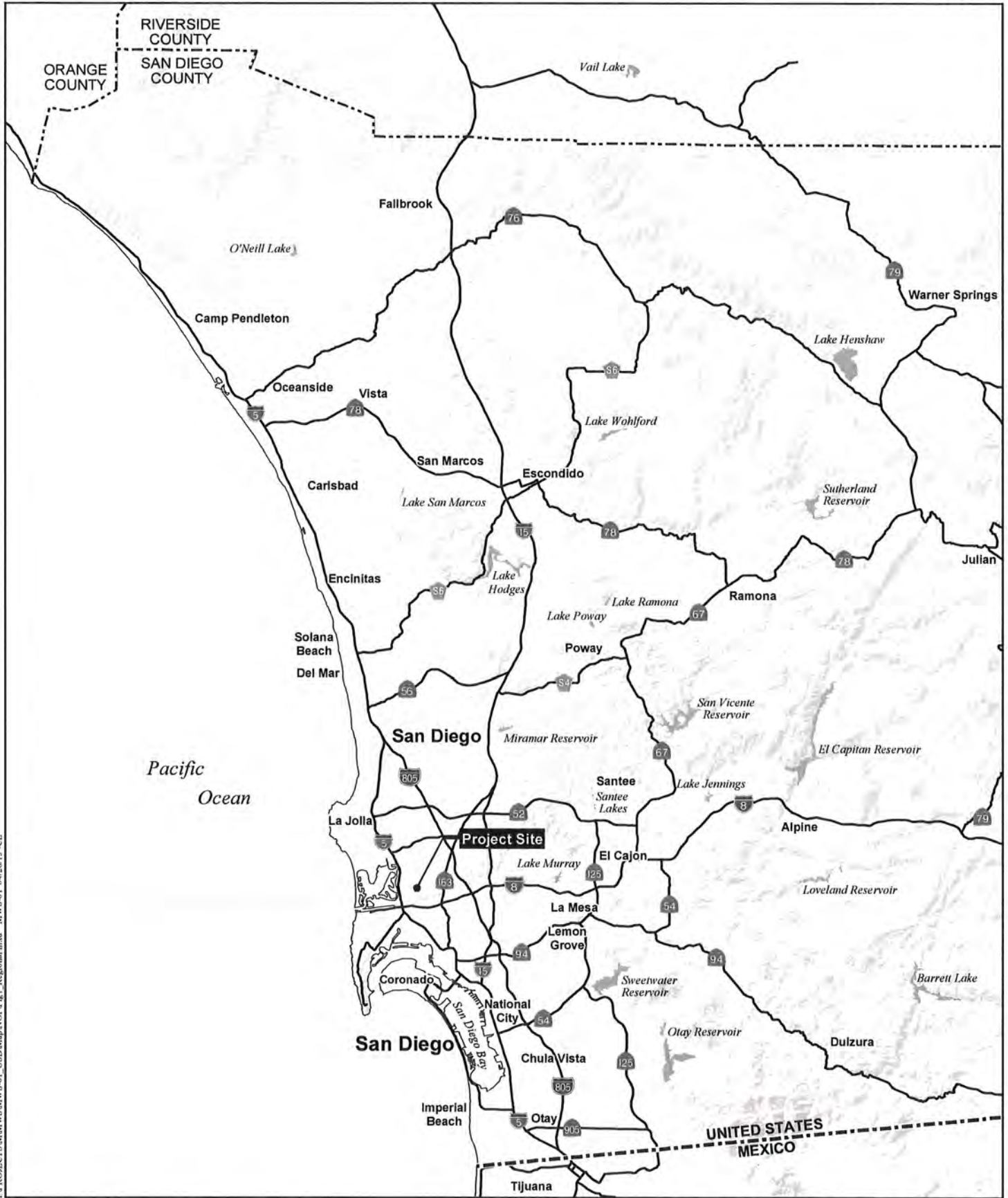
AVAILABILITY IN ALTERNATIVE FORMAT: To request the this Notice or the City's Scoping Letter to the applicant detailing the required scope of work in alternative format, call the Development Services Department at (619) 446-5460 (800) 735-2929 (TEXT TELEPHONE).

ADDITIONAL INFORMATION: For environmental review information, contact Lindsey H. Sebastian at (619) 236-5993. 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 DAILY TRANSCRIPT and distributed on April 4, 2016.

Kerry M. Santoro
Deputy Director
Development Services Department

DISTRIBUTION: See Attached

ATTACHMENTS: Figure 1: Regional Map
Figure 2: Vicinity Map
Figure 3: Site Plan
Scoping Letter



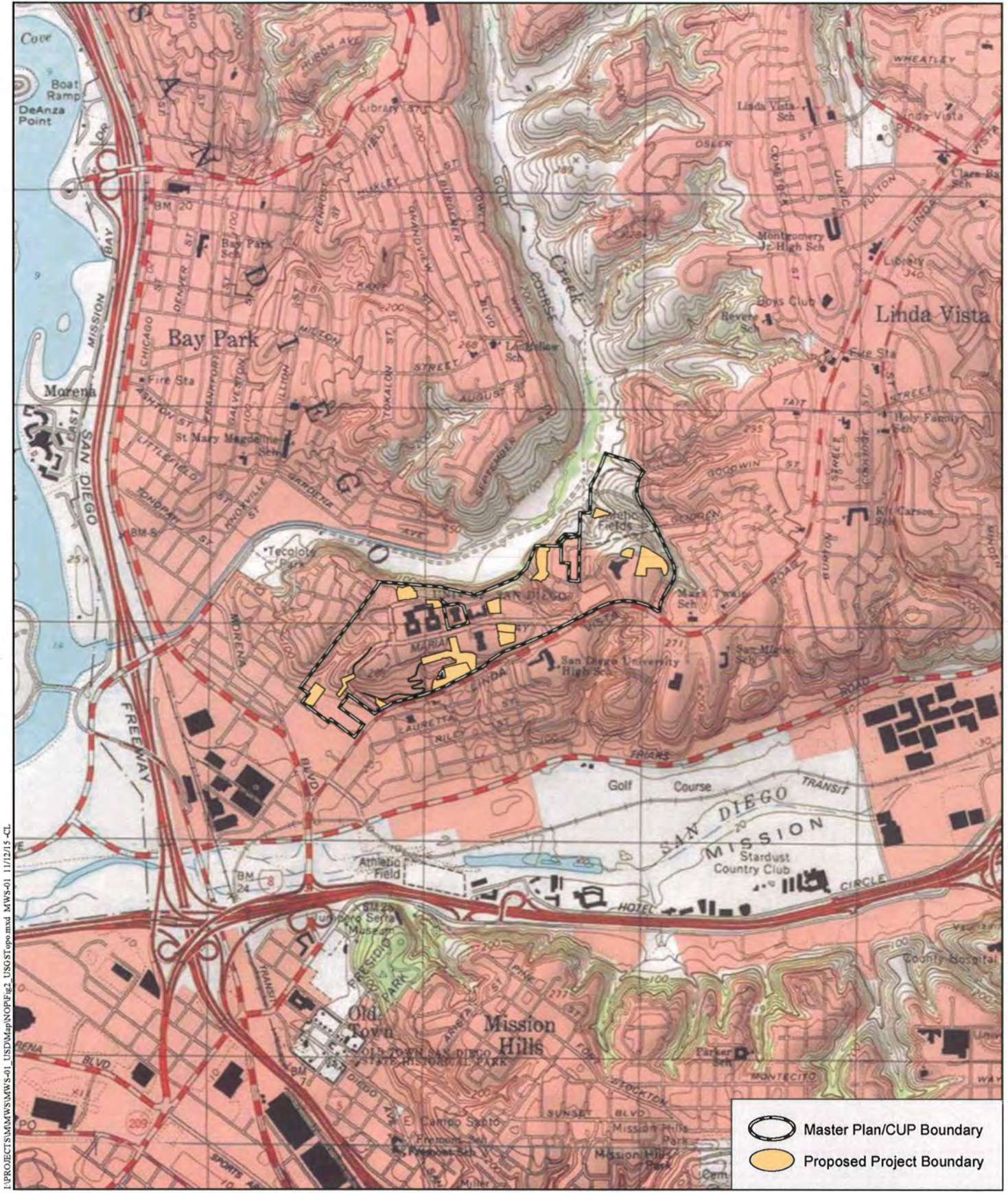
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Regional Location Map

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE



Figure 1

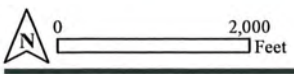


Project Vicinity (USGS Topography)

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 2

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Source: M. W. Steele Group, Inc. 2015

Project Site Plan

UNIVERSITY OF SAN DIEGO MASTER PLAN UPDATE

Figure 3

April 4, 2016

Mr. Ky Snyder
University of San Diego
5998 Alcalá Park Drive
San Diego, CA 92110

SUBJECT: Scope of Work for Environmental Impact Report for the University of San Diego (USD) Master Plan Update Project (Project No. 417090); SCH No. 93121032

Dear Mr. Snyder:

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental Analysis Section (EAS) of the Development Services Department of the City of San Diego has determined that the proposed project may have significant effects on the environment. The preparation of a subsequent Environmental Impact Report (EIR) to the 1996 EIR for the existing campus Master Plan (EIR No 92-0568; SCH No. 93121032) is required, pursuant to Section 15162(a) of the CEQA Guidelines. The EIR should take into consideration any updated baseline conditions and circumstances in the project area, as well as changes to the Master Plan and its impacts associated with the proposed update.

The purpose of this letter is to identify the issues to be specifically addressed in the EIR. The EIR shall be prepared in accordance with the City's "Technical Report and Environmental Impact Report Guidelines," dated September 2002 and updated December 2005. A copy of the current guidelines is attached.

A Notice of Preparation (NOP) will be distributed to the Responsible Agencies and others who may have an interest in the project as required by CEQA Section 15082. CEQA Section 21083.9(a)(2) requires scoping meetings for projects that may have statewide, regional or area-wide environmental impacts. The City's environmental review staff has determined that this project meets this threshold. A public scoping meeting has been scheduled for April 20, 2016, from 6:00 PM to 8:00 PM at the USD Kroc Institute for Peace and Justice (KIPJ), Room A, located at 5998 Alcalá Park Drive, San Diego, CA 92110. Please note that, depending upon the number of attendees, the meeting could end earlier than 8:00 PM.

Please note, changes or additions to this scope of work may be required as a result of input received in response to the NOP and Scoping Meeting. The applicant may also need to adjust the project over time through the discretionary review process, and these changes would be disclosed in the EIR under the section "History of Project Changes" and accounted for in the EIR impact analysis to the

extent required by CEQA. Further, it is possible that a supplement to an EIR may be required per Section 15163(a) of the CEQA Guidelines, instead of a subsequent EIR, if further review and analysis of the project demonstrates only minor additions or changes are necessary to make the previous EIR adequately apply to the project. A final determination and decision on whether a subsequent or supplement EIR is required shall be made by EAS after review and approval of the draft technical studies completed for the EIR. Any such changes shall be disclosed and explained within the EIR.

PROJECT DESCRIPTION

Project Background: In 1996, USD received approval of its existing Master Plan to guide the phased buildout of the campus through the year 2030. The City issued Conditional Use Permit (CUP)/Resource Protection Ordinance (RPO) Permit No. 92-0568 to allow the campus to construct 23 conceptual projects and expand student population to 7,000 full-time equivalent (FTE). Two future study areas were also identified in the Master Plan. The sequence of the projects was not determined at that time in order to provide flexibility with regard to economics and academic needs. The 1996 Master Plan EIR was prepared to assess the short- and long-term, as well as cumulative, impacts of implementing the Master Plan and was certified in conjunction with the CUP approvals. A Deed Restriction was also recorded, in conjunction with approval of the 1996 RPO Permit, to protect sensitive biological resources and steep hillsides avoided by the Master Plan.

The Master Plan is a document that records the vision and goals of the physical campus. This vision for the campus is updated from time to time to reflect the changes in demographics and the economy that affect higher education. Most importantly, the Master Plan is required by the City as the basis for the university's CUP and to ensure the University's fulfillment of current regulations. Over the last several years, USD campus officials have been conducting vision planning and space planning exercises to address the future needs of the university. An update to the existing Master Plan is now proposed.

Location: The USD campus occupies approximately 180 acres of land devoted to university-related uses in the central portion of the City of San Diego (City), in the community of Linda Vista. The campus is located 4 miles north of downtown San Diego, approximately 0.5 mile east of Interstate 5 (I-5) and 0.5 mile north of Interstate 8 (I-8) (Figures 1 and 2). The USD campus is located within an unsectioned area of Township 16 South, Range 3 West, on the U.S. Geological Survey (USGS) 7.5-minute La Jolla quadrangle map. Tecolote Canyon Natural Park forms the northern border of the property; Morena Boulevard is located to the west, with Via Las Cumbres bordering the campus on the east, and Linda Vista Road to the south. Elevations on campus range from approximately 50 feet above mean sea level (AMSL) to approximately 260 feet AMSL. With the exception of the steep, north-facing slopes along the northern campus border and the slopes on the western end of campus near Marian Way, the majority of the campus is developed and supports university facilities (buildings, parking lots, athletic fields, etc.) and associated landscaping.

Surrounding land uses include commercial/industrial development and residential housing in the Morena Boulevard area to the west of the campus, student and non-student multi-family housing immediately to the south and various types of residential development to the east. Tecolote Canyon Natural Park contains undeveloped regional open space to the north. The City's Multi-habitat Planning Area (MHPA) occurs on approximately 7.6 acres along the northern edge of the campus

and extends offsite into Tecolote Canyon. The campus is located within the Airport Influence Area (AIA) for San Diego International Airport and Montgomery Field.

Project Description: The proposed USD Master Plan Update provides a comprehensive revision of the 1996 Master Plan and Design Guidelines, as well as the campus' building space and infrastructure needs associated with increasing enrollment from 7,000 FTE to 10,000 FTE students over the next 20+ years. The USD Master Plan Update project would allow for the development of academic core/student service/support uses and athletics and recreation uses, and additional student housing. Parking supply expansions would also occur under the proposed Master Plan Update. The RPO Deed Restriction may be modified if the City determines the Deed Restriction is no longer needed because of new protective environmental regulatory requirements (i.e., MSCP Subarea Plan and ESL Regulations) enacted since the 1996 Master Plan and RPO Permit were approved.

Among the projects outlined in the Master Plan Update are 14 proposed construction sites, as well as 16 approved projects identified in the 1996 Master Plan EIR that have previous City review/approvals but remain unbuilt. The 14 proposed project sites would allow for the construction of academic/administrative buildings, student housing, student services uses, athletics/athletic support/administrative buildings, parking, pedestrian circulation and landscape improvements not contemplated in the 1996 Master Plan and related EIR. Design guidelines contained in the Master Plan Update would provide a comprehensive design framework to guide campus development. Other elements of the Master Plan Update address the planning context of the campus, provide an enrollment and space analysis, and identify sustainability goals.

Discretionary Approvals: The above-described improvements would require the following entitlements: (1) A Conditional Use Permit (CUP) to amend CUP/Resource Protection Ordinance (RPO) Permit No. 92-0568, CUP No. 40-0419, CUP No. 10325 (Project No. 6242) and CUP No. 489856 (Project No. 140201) for development/improvements to the existing university. The CUP is also required for the existing/proposed student dormitories and child care center. (2) A Site Development Permit (SDP) to amend SDP No. 10326 (Project No. 6242) and CUP/RPO Permit No. 92-0568 for development on a site that contains Environmentally Sensitive Lands (ESL). (3) A SDP for deviations to the zoning regulations. (4) Any other discretionary approvals as may be determined by the City.

EIR FORMAT/CONTENT REQUIREMENTS

The EIR serves to inform governmental agencies and the public of a project's environmental impacts. Emphasis in the EIR must be on identifying feasible solutions to environmental problems. The objective is not to simply describe and document an impact, but to actively create and suggest mitigation measures or project alternatives to substantially reduce significant adverse environmental impacts. The adequacy of the EIR will depend greatly on the thoroughness of this effort.

The EIR must be written in an objective, clear, and concise manner, in plain language. Each section/issue area of the EIR should provide a descriptive analysis of the project followed by a comprehensive evaluation of the issue area. The use of graphics and tables are encouraged to

replace extensive word descriptions and to assist in clarification. Conclusions must be supported with quantitative, as well as qualitative, information to the extent feasible. **The entire environmental document must be left justified. In addition, the environmental document is required to utilize Open Sans, 10 point font.**

I. CONCLUSIONS

Prior to public review, Conclusions to be attached at the front of the draft EIR will also need to be prepared. The Conclusions cannot be prepared until an approved draft has been submitted and accepted by the City.

II. TITLE PAGE

The EIR shall include a Title Page that includes the project name, Project Tracking System (PTS) number, State Clearinghouse (SCH) number and the date of publication. DO NOT include any company logos, or names of applicants and/or consultants.

III. TABLE OF CONTENTS

The Table of Contents must list all sections included in the EIR, as well as the Appendices, Tables, and Figures. Immediately following the Table of Contents, a list of acronyms and abbreviations utilized in the text must be provided.

IV. EXECUTIVE SUMMARY

The consultant will prepare the Executive Summary to be submitted for review with the last screen check draft EIR, unless otherwise determined. The executive summary shall have an independent numbering system (e.g., S-1, S-2). In general the summary should reflect the EIR outline, but not need contain every element of the EIR. At a minimum, the summary must include: a brief project description; impacts determined to be significant (including cumulative); impacts found to be less than significant; alternatives; areas of controversy; and a matrix listing the impacts and mitigation. Please refer to the Environmental Impact Report Guidelines for further detailed information.

V. INTRODUCTION

Introduce the purpose of the project with a brief discussion of the intended use and purpose of the EIR. Discuss how the decision to prepare the EIR, pursuant to CEQA Guideline Section 15162, was determined and how the EIR may be used as the basis for subsequent approvals, as appropriate; and describe the parameters for such future use of the EIR. Explain why the EIR meets the requirements for subsequent analysis under Section 15162 of the State CEQA Guidelines, which requires review of changes to the project that may result in significant impacts and that were not evaluated and disclosed in the previous CEQA document. This section shall describe and/or incorporate by reference applicable information contained in the 1996 Master Plan EIR. Additionally, this section shall provide a brief description of any other local, state and federal agencies that may be involved in the project review and/or any approvals.

VI. ENVIRONMENTAL SETTING

Describe the precise location of the project with an emphasis on the physical features of the site and the surrounding area and present it on a detailed topographic map and a regional map. Provide a local and regional description of the environmental setting of the project, including any changes in circumstances since adoption of the 1996 Master Plan EIR. Describe any upcoming changes to the area and any cumulative changes that may relate to the project site. Include the existing and planned land uses in the vicinity, on-and off-site resources, the community plan area land use designation(s), whether or not the project is located within the MHPA, existing zoning, utility easements and any required maintenance access, and any overlay zones within this section. Provide a recent aerial photo of the site and surrounding uses, and clearly identify the project location.

VII. PROJECT DESCRIPTION

Per CEQA Guideline Section 15124, the EIR shall include a discussion of the goals and objectives of the project, in terms of public benefit (increase in housing supply, employment centers, etc.). Project objectives will be critical in determining the appropriate alternatives for the project, which would avoid or substantially reduce potentially significant impacts. As stated in CEQA Section 15124 (b), "A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding consideration, if necessary. The statement of objectives should include the underlying purpose of the project."

This section shall also provide a detailed discussion of all features of the project. The description of the project shall include all major project features, including proposed campus use(s), site improvements, design guidelines, and parking areas associated with the Master Plan Update. Describe all the discretionary actions involved in the project. List and explain the requirements for permits or approvals from federal, state, and local agencies, as applicable. The EIR shall include sufficient graphics and tables to provide a complete description of all major project features. This discussion shall address the whole of the project.

VIII. HISTORY OF PROJECT CHANGES

This section of the EIR shall outline the history of the project and any physical changes that have been made to the project in response to environmental concerns identified during the review of the project (i.e., in response to NOP or public scoping meetings, or during the public review period for the draft EIR).

IX. ENVIRONMENTAL IMPACT ANALYSIS

This section shall analyze those environmental categories having a potential for adverse environmental impacts because of the project's effect on the existing conditions and/or modifications to the prior certified CEQA document. The EIR must include a complete discussion of the existing baseline conditions, significance thresholds, impact analysis, significance of impact, and mitigation for all environmental issue sections that identify significant impacts. The EIR must

represent the independent analysis of the Lead Agency. The City's current CEQA Significance Determination Thresholds (2011; 2012) shall be used to establish significant effects unless otherwise directed by the City.

In general, the EIR shall discuss all potential direct and indirect impacts associated with each environmental issue area listed below. Lastly, the EIR should summarize each required technical study or survey report within each respective issue section, and all requested technical reports must be included as the appendices to the EIR.

In each environmental issue section, mitigation measures to avoid or substantially lessen significant impacts must be clearly identified and discussed. The ultimate outcome after mitigation should also be discussed (i.e., significant but mitigated, significant and unmitigated). If other potentially significant issue areas arise during detailed environmental investigation of the project, consultation with the Development Services Department is required to determine if these areas need to be added to the EIR. As supplementary information is required, the EIR may also need to be expanded.

Land Use

Issue 1: Would the proposal result in a conflict with the environmental goals, objectives, or guidelines of the General/Community Plan in which it is located?

Issue 2: Would the proposal require a deviation or variance and the deviation or variance would in turn result in a physical impact on the environment?

Issue 3: Would the proposal conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional or state habitat conservation plan?

Issue 4: Would the proposal result in the exposure of people to noise levels which exceed the City's Noise Ordinance or are incompatible with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element of the General Plan?

Issue 5: Would the proposal result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP), including aircraft noise levels as defined by the plan?

The proposed project includes an amendment to the existing campus CUP, an SDP, and an MHPA Boundary Line Correction. This section shall provide a discussion of all applicable land use plans to establish a context in which the project is being proposed. Specifically, it shall discuss how the project implements the goals, objectives, and recommendations of the General Plan (including all of its elements), Climate Action Plan, Linda Vista Community Plan and Land Development Code. If the project is found to be inconsistent with any policies, the EIR would disclose and analyze any physical effects that may result from the inconsistency that could be considered significantly adverse.

The section shall provide a listing of all requested deviation(s)/variance(s). For each requested deviation or variance, provide analysis on whether the requested action would then result in a

physical impact on the environment. The bulk, scale and/or setbacks of any proposed structures that deviate from or exceed the development regulations in the Land Development Code should be discussed relative to other land uses in the surrounding communities. Potential deviations from the ESL regulations in the Land Development Code should also be noted. If the project would result in physical impacts on the environment due to any deviations or variances, the physical impacts could be considered significantly adverse.

The site is located within the MSCP and contains land within and adjacent to the MHPA. This section shall include a discussion of the existing MHPA lands on site (acreage, quality, etc.) and evaluate the project's conformance with the MSCP Subarea Plan, with specific attention to the Land Use Adjacency Guidelines, in terms of land use, drainage, toxic substances in runoff, lighting, noise, invasive plant species, and brush management requirements for the portion of the site within the MHPA. The proposed MHPA Boundary Correction should be addressed in the context of policy consistency. The potential policy impacts shall be discussed in the Land Use section, as well as the Biological Resources section where the physical impacts are discussed further.

The project site is located within the Airport Influence Area (AIA) for San Diego International Airport, an international airport operated by the San Diego County Regional Airport Authority, and Montgomery Field, a general aviation airport operated by the City. An acoustical analysis report shall be prepared for the project, as noted under Noise that would include an evaluation of the project's compatibility with the Airport Land Use Compatibility Overlay Zone contained in adopted plans for both airports. The section should also address the project's compatibility with future noise levels along Linda Vista Road, in accordance with the Noise Compatibility Guidelines (Table NE-3) in the Noise Element of the General Plan. Any inconsistencies identified shall be evaluated to determine if they would lead to a significant physical environmental impact.

Transportation/Circulation

- Issue 1: Would the proposal result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system?**
- Issue 2: Would the proposal result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp?**
- Issue 3: Would the proposal have a substantial impact upon existing or planned transportation systems?**
- Issue 4: Would the proposal conflict with adopted policies, plans or programs supporting alternative transportation modes?**
- Issue 5: Would the proposal result in substantial alterations to present circulation movements including effects on existing public access to beaches, parks, or other open space areas?**

Implementation of the proposed project would increase existing and future traffic volumes as the campus enrollment increases over time and has the potential to result in direct and/or cumulative

impacts on the surrounding local circulation network. Therefore, a transportation study must be prepared for this project consistent with the City's Traffic Impact Study Manual, to the satisfaction of the City Engineer, analyzing the traffic characteristics of the project. The transportation study shall analyze the expected trips from the project and document any impacts on intersections, roadways and freeways. The transportation study shall include descriptions and graphics of the conditions during near-term and at project buildout. The transportation study shall form the basis of the impact analysis for this section of the EIR.

The EIR shall present mitigation measures that are required to reduce significant impacts identified in the transportation study and discuss if those measures will mitigate impacts to below a level of significance. If the project results in direct traffic impacts, which cannot be mitigated to below a level of significance, an alternative to the proposed project that avoids or substantially lessens direct traffic impacts shall be provided in the EIR. An evaluation of the project's cumulative impacts shall also be conducted. Should the project's contribution to cumulatively significant impacts be considerable, a discussion on the feasibility of mitigation shall also be provided.

The EIR section shall also address the project's walkability, pedestrian linkages, bicycle connectivity and transit opportunities taking into consideration applicable General and Community Plan policies encouraging alternative methods of travel. Potential effects on existing public access to Tecolote Canyon Natural Park should be discussed in the EIR section.

Biological Resources

- Issue 1: Would the proposal result in substantial adverse impacts, either directly or 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 Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?**
- Issue 2: Would the proposal result in substantial adverse impacts on any Tier I, Tier II, Tier IIIA or Tier IIIB habitats as identified in the Biology Guidelines of the Land Development Code or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS?**
- Issue 3: Would the proposal result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pools, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?**
- Issue 4: Would the proposal interfere with the movement of any native resident or migratory fish or wildlife species or within established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan or impede the use of native wildlife nursery sites?**
- Issue 5: Would the proposal conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Conservation Community Plan (NCCP) or other approved local,**

regional or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?

Issue 6: Would the proposal introduce a land use within an area adjacent to the Multiple Habitat Planning Area (MHPA) that would result in adverse edge effects?

Issue 7: Would the proposal introduce invasive species of plants into a natural open space area?

Issue 8: Would the proposal result in a conflict with any local policies or ordinances protecting biological resources?

The project site is developed with an educational university, with portions of the campus supporting limited amounts of sensitive biological resources, including Tier I, II or III habitats, listed species, narrow endemics, and wetlands. The MHPA occurs within a portion of and adjacent to the project site in Tecolote Canyon Natural Park. The project will impact sensitive biological resources and has the potential to result in direct, indirect and/or cumulative impacts to biological resources in the MHPA. The habitat within Tecolote Canyon Natural Park and the adjacent slopes on site do not connect otherwise isolated blocks of habitat allowing movement or dispersal of plants and wildlife on a regional scale, but they serve as a local wildlife corridor within the project area. An updated biological resources survey and letter report must be prepared on the project, to the satisfaction of City EAS and MSCP staff.

The biological resources letter report must incorporate the results of site-specific field surveys and identify all impacts to biological resources consistent with the ESL regulations, the City Biology Guidelines, and the MSCP Subarea Plan. A summary discussion of the project's conformance with the MSCP Subarea Plan Land Use Adjacency Guidelines must be addressed in the report, including the proposal to modify the boundary of the MHPA as part of a Boundary Line Correction. The biological resources letter report would form the basis of the impact analysis for this section of the EIR, as well as the policy consistency discussion under Land Use.

The EIR shall present mitigation measures that are required to reduce significant impacts and discuss if those measures will mitigate impacts to below a level of significance. If the project results in biological resources impacts, which cannot be mitigated to below a level of significance, the alternatives section of the EIR should include a project alternative that will avoid or substantially lessen biology impacts.

Evidence must be provided that all required agency (USFWS, CDFW) permits and authorizations have been acquired for impacts to sensitive species not covered by the MSCP.

Historical Resources

Issue 1: Would the proposal result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a prehistoric or historic building (including an architecturally significant building), structure, object or site?

Issue 2: Would the proposal result in any impact to existing religious or sacred uses within the potential impact area?

Issue 3: Would the proposal result in the disturbance of any human remains, including those interred outside of formal cemeteries?

Historical resources consisting of buildings over 45 years in age occur on the project site and may potentially be directly or indirectly affected by project implementation. Undeveloped lands contain the potential for known and unknown archaeological resources. An updated archaeological resources report form is required to determine if any archaeological resources may be located on site, to the satisfaction of City EAS staff. The report shall include the results of the literature review and archaeological site survey conducted on the project site and address the potential for impacts to historic resources. Appropriate graphics, including a map of the Area of Potential Affect (APE), shall be provided. The archaeological resources report form would form the basis of the impact analysis for this section of the EIR.

If potentially significant impacts to historic resources are identified, the EIR shall include requirements for conducting a site-specific historic resources evaluation to determine the design measures that would minimize such impacts, consistent with the Secretary of the Interior Standards for the Treatment of Historic Properties. If potentially significant archaeological impacts are identified, the EIR shall identify requirements for archaeological monitoring during grading operations and specify mitigation requirements for any discoveries.

Air Quality

Issue 1: Would the proposal conflict with or obstruct implementation of the applicable air quality plan?

Issue 2: Would the proposal cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

Issue 3: Would the proposal expose sensitive receptors to substantial pollutant concentrations?

Issue 4: Would the proposal exceed 100 pounds per day of Particulate Matter (PM) dust?

The construction and operational phases of the project have the potential to affect ambient air quality and long-term air quality management. Construction can create short-term air quality impacts through equipment use, ground-disturbing activities, architectural coatings, and worker automotive trips. Air quality impacts resulting from the operation of the project would be primarily generated by increases in automotive trips. An air quality analysis must be prepared which discusses the project's impact on the ability to meet state, regional, and local air quality strategies/standards, as well as any health risks associated with construction. The proposed development would not generate odor impacts, thus this issue does not need to be addressed further.

Describe the project's climatological setting within the San Diego Air Basin and the basin's current attainment levels for State and Federal Ambient Air Quality Standards. Discuss short- and long-term and cumulative impacts on regional air quality, including construction and operational-related sources of air pollutants. Discuss the potential impacts from the increase in trips to the Regional Air Quality Standards, and the overall air quality impacts from such trips, and any proposed mitigation measures. Should the project result in a significant decrease in the levels of service of any intersection in the vicinity of a sensitive receptor, address the potential degradation of localized air quality, which may result, including the possibility of "hot spots" within the area. Also include a discussion of potential dust generation during construction within this section of the document, together with any required dust suppression measures that would avoid or lessen dust-related impacts to sensitive receptors within the area. Because none of the structures would be tall enough or close enough to other structures so as to affect air movements, the EIR section will not be required to address that issue.

Hydrology/Water Quality

Issue 1: Would the proposal result in a substantial increase in impervious surfaces and associated increased runoff?

Issue 2: Would the proposal result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?

Issue 3: Would the proposal develop wholly or partially within the 100-year floodplain identified in the FEMA maps or impose flood hazards on other properties?

Anticipated changes to existing drainage patterns and runoff volumes should be addressed in the EIR. Drainage and water quality impacts were previously assessed as part of the USD Master Plan project. An updated hydrology study must be provided and measures to protect on-site and downstream properties from increased erosion and siltation must be identified. The EIR shall address the project's potential for impacting the hydrologic conditions within the project area and downstream, and discuss site planning and drainage design techniques to reduce runoff volumes and velocities, if appropriate. The water quality analysis shall discuss the project's potential to cause sedimentation due to erosion, urban runoff carrying contaminants and direct discharges of pollutants. Compliance with the City's Storm Water Standards is generally considered to preclude water quality impacts.

Public Utilities

Issue 1: Would the proposal result in the need for new water or sewer systems or require substantial alterations to existing utilities, the construction of which would create physical impacts?

Issue 2: Would the proposed project use excessive amounts of potable water?

Issue 3: Would the proposal have an effect upon, or result in a need for new or altered solid waste facilities?

Construction of new campus facilities may require expansion of public infrastructure serving the campus for potable water and/or sewage conveyance systems. However, the uses, buildings and facilities proposed by the Master Plan would be consistent with existing campus facilities, would comply with state and local codes for energy efficiency would not require an excessive amount of energy to operate. Landscaping to be installed as part of the project would be drought-tolerant and not consist of large expanses of turf or other water-demanding treatments. The EIR shall include a discussion of potential impacts to public utilities as a result of the project, as well as identify any conflicts with existing and planned infrastructure, and evaluate any need for upgrading infrastructure. The focus on the analysis shall be on any physical impacts resulting from the construction of needed new facilities.

The EIR will include a discussion of the project's construction and operational effects on the City's ability to handle solid waste. According to Assembly Bill (AB) 939 and AB 341, the City was required to divert at least 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting by 2000 and increase the diversion to 75 percent by 2030. The proposed project meets the City's threshold of development of 40,000 square feet or more and therefore a Waste Management Plan (WMP) must be prepared, approved by the City's Environmental Services Department, and summarized in the EIR. The WMP must address recycling and solid waste disposal, for demolition, construction, and post-construction occupancy phases of the project.

A Sewer and/or Water Study will be completed to determine if appropriate sewer/water facilities are available to serve the campus development under the Master Plan Update. The analysis and conclusions of the studies shall be included in the EIR. Additionally, the proposed project has the potential to require potable water supplies equivalent to or greater than a 500-unit residential development, as stated in the California Water Code Section 10912. A Water Supply Assessment (WSA) will be required to determine if adequate water supplies are available within the City to serve the project. The analysis and conclusion of the WSA shall be included in the EIR.

Visual Effects/Neighborhood Character

Issue 1: Would the proposal result in a substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan?

Issue 2: Would the proposal create a negative aesthetic site or project?

Issue 3: Would the proposal include bulk, scale, materials, or style which would be incompatible with surrounding development?

Issue 4: Would the proposal cause substantial alteration to the existing or planned character of the area?

Issue 5: Would the proposal result in a substantial change in the existing landform?

The site is a developed university campus with a range of campus-related uses adjacent to the Linda Vista community and Tecolote Canyon Natural Park. Although there are views from the campus to Mission Bay Park, there are no vistas or scenic views designated on or around the project site in the

Linda Vista Community Plan. The Community Plan recognizes there are scenic resources to and from Tecolote Canyon Natural Park and Mission Bay Park within the community. The Master Plan Update includes the construction of several new buildings, improvements, and facilities on the project site, some of which would be visible from nearby public vantage points, such as Linda Vista Road and Tecolote Canyon Natural Park. New development would primarily occur on developed portions of campus and no distinctive trees or landmarks would be removed; limited development would occur on steep hillsides. The proposal includes design guidelines which are proposed to address site planning, architectural design, landscape design, lighting, signage and other elements of the visual character. The EIR shall provide an evaluation of the Visual Quality/Neighborhood Character (Aesthetics) changes due to the proposed project, including an evaluation of consistency with policies protecting scenic resources and views in the vicinity of the project. Consistency with the bulk and scale regulations in the Land Development Code shall be addressed. Describe the proposed Design Guidelines and how they will address consistency with existing and planned character of the area. Describe how the character of the surrounding area would be affected by the implementation of the Master Plan Update. Identify potential effects on steep hillsides consistent with the ESL regulations.

X. MANDATORY DISCUSSION AREAS

In accordance with CEQA Section 15126, the EIR must include a discussion of the following issue areas:

- A. *Significant effects of the proposed project.* These impacts shall be clearly identified and described in the EIR, giving due consideration to both the short-term and long-term effects. The discussion should include relevant specifics of the area, the resources involved, physical changes, alterations to ecological systems, and changes induced in population distribution, population concentration, the human use of the land (including residential development), health and safety problems caused by the physical changes, and other aspects of the resource base such as water, historical resources, scenic quality, and public services. The EIR shall also analyze any significant environmental effects the project might cause by bringing development and people into the affected area.
- B. *Any significant environmental effects that cannot be avoided if the proposed project is implemented.* Include impact threshold criteria to be used. Provide mitigation measures where appropriate; including triggers, details, responsible entities, and a monitoring and report schedule. Include a sentence on the significance of each impact area discussed, with effect of the proposed mitigation if appropriate.
- C. *Any significant irreversible environmental changes that would result from the implementation of the proposed project.* In accordance with CEQA Section 15126.2(c), the EIR shall include a discussion of any significant irreversible environmental changes which would be caused by the project should it be implemented. This section shall address the use of nonrenewable resources during the construction and life of the project. See CEQA Section 15127 for limitation on the requirements for this discussion.

- D. *Growth-inducing impacts of the proposed project.* The Growth Inducement analysis should conclude: 1) how the project is directly and indirectly growth inducing (i.e., fostering economic or population growth by land use changes, construction of additional housing, etc.), and 2) if the subsequent consequences (i.e., impacts to existing infrastructure, requirement of new facilities, etc.) of the growth inducing project would create a significant and/or unavoidable impact, and provide for mitigation or avoidance. Address the potential for growth inducement through implementation of the proposed project; accelerated growth could further strain existing community facilities or encourage activities that could significantly affect the environment. This section need not conclude that growth-inducing impacts, if any, are significant unless the project would induce substantial growth or concentration of population that would lead to significant environmental impacts.

XI. CUMULATIVE EFFECTS

When this project is considered with other past, present, and reasonable foreseeable future projects on the project site and in the project area, implementation could result in significant environmental changes, which are individually limited but cumulatively considerable. Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts must be discussed in a separate section of the EIR. This section should update the cumulative discussion contained in the prior CEQA document completed in 1996.

XII. EFFECTS NOT FOUND TO BE SIGNIFICANT

Provide a discussion of the environmental issue areas that were determined not to be significant or significant effects that would not be substantially more severe than discussed in the 1996 Master Plan EIR (pursuant to Section 15162 of the CEQA Guidelines) and describe the reasons for this determination. Environmental issue areas in which effects have been preliminarily been determined not to be significant include Agricultural and Forestry Resources, Geologic Conditions, Health and Safety, Mineral Resources, Noise, Paleontological Resources, Population and Housing, and Public Services and Facilities. This discussion shall be based in part on information contained in project-specific technical studies, as well as the 1996 Master Plan EIR, as applicable.

If issues related to these areas or other potentially significant issues areas arise during the detailed environmental investigation of the project, consultation with EAS is recommended to determine if subsequent issues area discussion needs to be added to the EIR. Additionally, as supplementary information is submitted (such as with the technical reports), the EIR may need to be expanded to include these or other additional issue areas.

XIII. ALTERNATIVES

The EIR must place major attention on reasonable alternatives that avoid or mitigate the project-level significant impacts for the environmental issue sections that are addressed in detail in the environmental impact analysis. These alternatives should be identified and discussed in detail and should address all new significant impacts associated with the revisions to the Master Plan. The alternatives analysis should be conducted in sufficient detail to clearly assess the relative level of

impacts and feasibility. See Section 15364 of the CEQA Guidelines for the CEQA definition of "feasible."

This section should provide a meaningful evaluation, analysis and comparison of alternatives impacts as compared to those of the proposed project (matrix format recommended). These alternatives should be addressed in detail and address all new significant impacts of the proposed project. The alternatives evaluation should be conducted in sufficient graphics, narrative and detail to clearly assess their relative impacts and feasibility.

Preceding the detailed alternatives analysis, provide a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reasons for their rejection must be explained in detail and demonstrate to the public the analytical route followed in rejecting certain alternatives.

The analysis should consider the ability of each alternative to meet the project objectives while reducing or substantially lessening significant environmental impacts. The following alternatives, at a minimum, must be considered:

A. No Project/No Development

This alternative would include no changes to the existing site conditions. The site would remain developed as a university; however, no expansion in student enrollment or construction of new facilities would occur. Describe any environmental effect changes that would occur if the site remained in its current state.

B. No Project/Existing Master Plan Development

This alternative would allow for the construction of the 16 projects previously approved by the City but have not been constructed on campus. No increase in student enrollment, above levels currently permitted on campus would occur. Changes to the existing environment shall be described.

C. Reduced Development Alternative

If the traffic study shows a substantial increase in traffic volumes in the community as a result of build-out of the proposed project, a Reduced Development Alternative that reduces the overall traffic impacts should be presented in the EIR. Work with the City's EAS and Transportation Development staff to determine the development intensity that should be considered in this alternative development scenario.

D. Other Project Alternatives

If the biological resources analysis determines that the project would impact sensitive resources that require a modification to the project footprint to avoid, then an Other Project Alternative which substantially lessens the project's impact and/or reduces the mitigation requirements should be considered in this section of the EIR.

If through the environmental analysis process, other alternatives become apparent which would mitigate potentially significant impacts; these alternatives must be discussed with EAS staff prior to including them in the EIR. It is important to emphasize that the alternatives section of the EIR should constitute a major part of the report. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternatives analysis.

XIV. MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation measures should be clearly identified and discussed. A Mitigation, Monitoring and Reporting Program (MMRP) for each issue area with significant impacts is mandatory and projected effectiveness must be assessed (i.e., all or some CEQA impacts would be reduced to below a level of significance, etc.). The list of measures in the MMRP should include measures contained in the EIR. At a minimum, the MMRP should identify: 1) the department responsible for the monitoring; 2) the monitoring and reporting schedule; and 3) the completion requirements. In addition to separate issue area mitigation discussions in the various topics of the EIR, a consolidated, stand alone, verbatim, all issue area MMRP should also be included in the EIR in a separate section and a duplicate separate copy must also be provided to EAS.

XV. REFERENCES

Material must be reasonably accessible. Use the most up-to-date possible and reference source document.

XVI. INDIVIDUALS AND AGENCIES CONSULTED

List those consulted in preparation of EIR. Seek out parties who would normally be expected to be a responsible agency or an interest in the project.

XVII. CERTIFICATION PAGE

Include City and Consulting staff members, titles, and affiliations.

XVIII. APPENDICES

Include the EIR NOP, scoping meeting transcript, and any comments received regarding the NOP and Scoping Letter. Include all accepted technical studies.

CONCLUSION

If other potentially significant issue areas arise during detailed environmental investigation of the project, consultation with staff from the Environmental Analysis Section of the Land Development Review Division is required to determine if these other areas need to be addressed in the EIR. Should the project description be revised, an additional scope of work may be required. Furthermore, as the project design progresses and supplementary information becomes available, the EIR may need to be expanded to include additional issue areas.

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Mr. Ky Snyder
April 4, 2016

It is important to note that timely processing of your project will be contingent in large part on your selection of a well-qualified consultant. Prior to starting work on the EIR, a meeting between the consultant and EAS will be required to discuss and clarify the scope of work. Until the screencheck for the draft EIR is submitted, which addresses all of the above issues, the environmental processing timeline will be held in abeyance. Should you have any questions regarding this letter or the environmental process, please contact the environmental analyst, Lindsey Sebastian at (619) 236-5993; for general questions regarding project processing and/or the project, contact John Fisher, Project Manager at (619) 446-5231.

Sincerely,



Kerry Santoro
Deputy Director
Development Services Department

KS/ls

cc: Elizabeth Shearer-Nguyen, Environmental Analysis Section
Lindsey H. Sebastian, Environmental Analysis Section
Environmental Project File
John Fisher, Project Management Division
Melissa Plaskonos, USD Facilities Management
Kelly Douglas, USD General Counsel
Kim Baranek, HELIX Environmental Planning, Inc., Consultant
Diego Valesco, M.W. Steel Group, Consultant