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TECHNICAL MEMORANDUM

To: Laura Shinn, Director, Facilities Planning, San Diego State University

From: Michele Webb, Environmental Planner

Sarah Lozano, Principal

Cc: Michael Haberkorn, Gatzke, Dillon & Ballance

Subject: San Diego State University Plaza Linda Verde EIR Addendum – Land Use

Impact Analysis

Date: March 25, 2014 **Attachments:** Figures 1–4

This memorandum provides the land use impact analysis for proposed revisions to the previously approved San Diego State University (SDSU) Plaza Linda Verde project located in San Diego, California, and is prepared as part of an Addendum to the Plaza Linda Verde Final Environmental Impact Report (EIR) (May 2011).

The memorandum is intended to (1) briefly summarize the land use impacts and significance conclusions identified in the May 2011 SDSU Plaza Linda Verde Final EIR and (2) discuss whether the proposed revisions would result in new significant environmental effects or a substantial increase in the severity of significant effects previously identified in the May 2011 Final EIR.

1 PROJECT LOCATION AND DESCRIPTION

The proposed project site is located on the SDSU campus, within the College Area of the City of San Diego (City), San Diego County, California (Figure 1, Regional Map, and Figure 2, Vicinity Map). Specifically, the project site is located generally between Aztec Walk and Montezuma Road in the southeastern portion of campus (see Figure 3, Project Area).

The proposed project consists of a mixed-use project that would straddle both the east and west sides of College Avenue between the SDSU Transit Center/Pedestrian Bridge and Montezuma Road (see Figure 4, Proposed Site Plan). The proposed project would include commercial/retail uses on the first floor of several buildings and residential uses on the upper floors. A stand-alone parking structure would also be constructed west of College Avenue. The project was analyzed in the Plaza Linda Verde EIR, which was finalized and certified in May 2011. Table 1 provides a summary of all buildings proposed and analyzed in the May 2011 Final EIR.

As SDSU has proceeded with preliminary project planning and design, several modifications to the approved project are being proposed. These changes include modifications to Buildings 1, 2, and 3 (all located west of College Avenue) and are summarized in Table 2. No changes to Buildings 4, 5, 6, or 7 would occur; however, details related to these buildings have been provided in Tables 1 and 2 for informational purposes. Additionally, no changes to the building footprints or project area are proposed.

Table 1 Approved – May 2011 Plaza Linda Verde Final EIR

	Total	Retail	Rentable	Residential	Housin	g Units			
Project Components	Size (GSF)	Square Feet (GSF)	Square Feet (SF)	Square Feet (GSF)	Apartment Style	Dormitory Style	Beds	Parking Spaces	Building Stories
Building 1	118,550	25,000	24,340	93,550	84	0	352	0	5
Building 2	85,640	20,000	17,975	65,640	60	0	264	0	5
Building 3 (Parking Structure)	128,925	2,000	1,815	0	0	0	0	342	5*
Building 4	123,004	23,000	13,445	100,004	63	0	256	69–110	5
Building 5	157,971	20,000	19,634	137,971	87	0	344	91–110	5
Building 6	48,070	0	0	48,070	44	0	192	0	4
Building 7	55,300	0	0	55,300	52	0	224	0	4
Total	717,460	90,000	77,209	500,535	390	0	1,632	502-562	n/a

Notes:

GSF = gross square feet.

Table 2
Revised – March 2014 Addendum to the May 2011 Plaza Linda Verde Final EIR

	Total	Retail	Rentable	Residential	Housin	g Units			
Project Components	Size (GSF)	Square Feet (GSF)	Square Feet (SF)	Square Feet (GSF)	Apartment Style	Dormitory Style	Beds	Parking Spaces	Building Stories
Building 1*	139,329	20,553	19,902	119,329	85**	187	359	0	6
Building 2*	117,387	14,868	14,056	102,519	68**	158	300	0	6
Building 3 (Parking Structure)*	143,693	0	0	0	0	0	0	392	7
Building 4	123,004	23,000	13,445	100,004	63	0	256	69–110	5
Building 5	157,971	20,000	19,634	137,971	87	0	344	91–110	5
Building 6	48,070	0	0	48,070	44	0	192	0	4
Building 7	55,300	0	0	55,300	52	0	224	0	4
Total	784,754	78,421	67,037	563,193	399	345	1,675	552–612	n/a

Notes

^{**}Apartment equivalent has been calculated. The total housing units planned for Buildings 1 and 2 should be conveyed in either "apartment style" or "dormitory style" numbers, not both. For example, Building 1 would include 85 apartment style units **OR** 187 dormitory style units, not both. GSF = gross square feet.



^{*}The approved parking structure consisted of one subterranean story and four aboveground stories.

^{*}Buildings that have changed since the May 2011 Final EIR and are the subject of the March 2014 Addendum analysis

As indicated in Table 2, the proposed changes to the previously approved project would include a change in residential units from apartment-style units to dormitory-style rooms. Table 2 shows the number of dormitory-style rooms (345) that would be built in Buildings 1 and 2 and their associated apartment-style equivalent (153). Other changes include an increase in total gross square footage from 717,460 to 784,754; a decrease in retail gross square footage from 90,000 to 78,421; an increase in residential gross square footage from to 500,535 to 563,193; an increase in overall bed count from 1,632 to 1,675; and the addition of 50 parking spaces to Building 3. The increased square footage is associated with an increase in one additional floor to Buildings 1 and 2 and two additional floors to Building 3. The additional floor planned for Buildings 1 and 2 would add approximately 11 feet in height to each building, while the additional two floors planned for Building 3 would add approximately 40 feet in height to the proposed structure.

2 METHODS

In the Plaza Linda Verde Final EIR, existing land uses at the project site were reviewed based on aerial photographs and land use maps. The potential land use and planning impacts associated with the proposed project were analyzed by reviewing the proposed land uses for areas within and surrounding the campus relative to the following adopted land use plans and policies:

- City of San Diego General Plan
- College Area Community Plan
- City of San Diego Land Development Code
- College Community Redevelopment Plan
- College Community Redevelopment Project Master Project Plan
- College Community Redevelopment Project Area Third Five-Year Implementation Plan
- College Community Redevelopment Project Core Subarea Design Manual
- College Area Public Facilities Financing Plan
- City of San Diego Bicycle Master Plan.

The potential for a change in any of the land use determinations made in the Plaza Linda Verde Final EIR was analyzed by first examining which of the plans listed above contain policies and regulations relating to aspects of the project that would be altered, particularly plans and regulations dealing with building height and amount of residential space. Both the City Land Development Code and the College Area Community Plan contain zoning regulations that give height and/or density specifications for the proposed project area. Because height and density are the primary aspects of the project that would change, this change was analyzed in detail and

compared with the height and density of the original project and with City regulations. It should be noted that updated density calculations used the "apartment equivalent" figures contained in Table 2.

The proposed modifications were evaluated to determine whether they would change the project to the extent that the general land use, overall purpose, and overall objectives of the project would change. This evaluation was used to determine whether the modifications would alter the original consistency determinations for the guiding principles, goals, policies, and objectives of the previously listed City and redevelopment agency land use plans. Lastly, the modifications were evaluated to determine whether they would alter the project to the extent that original determinations regarding habitat conservation plans and potential division of communities would change.

3 SUMMARY OF PLAZA LINDA VERDE FINAL EIR IMPACTS AND CONCLUSIONS

3.1 Consistency with Applicable Plans, Policies, and Regulations

The consistency of the project with applicable plans, policies, and regulations was analyzed by examining the project's consistency with the nine City and redevelopment agency planning and land use documents listed in Section 2, Methods. However, as a state entity, California State University (CSU)/SDSU does not fall within the jurisdiction of the City, and the plans and policies of the City and its redevelopment agency do not apply to CSU/SDSU. Therefore, the analysis of the applicable City and redevelopment agency plans, polices, and regulations was provided in the Plaza Linda Verde Final EIR for disclosure purposes only. With limited exception, the proposed project was found consistent with local land use plans and regulations. The consistency determinations that were made in the Plaza Linda Verde Final EIR are summarized below.

With the exception of the College Area Community Plan and the City of San Diego Land Use Development Code, the proposed project was found to be consistent with all plans listed in Section 2. This consistency determination was based on an analysis of the project with respect to each plan's guiding principles, goals, policies, and objectives. Because the proposed project implements the City of Villages Strategy, which is considered a key aspect of the City's development goals, the project either implements or does not hinder implementation of the goals and policies found within City and redevelopment agency plans. Additionally, with respect to the redevelopment plans, the project directly accomplishes the goals for the Core Subarea and was designed to be consistent with the guidelines of the Core Subarea Design Manual. The proposed project was also deemed consistent with the College Area Facilities Financing Plan and the City

of San Diego Bicycle Master Plan since it would either provide funding for projects described in these plans or would not hinder the City from implementing the projects described in the plans.

Portions of the proposed project were deemed inconsistent with allowable building heights and residential densities and potentially inconsistent with lot coverage and setback requirements as defined in the zoning regulations of the Land Use Development Code and the College Area Community Plan. The proposed project was also deemed inconsistent with the College Area Community Plan recommendation that the university not expand beyond its present campus boundary. Inconsistencies with the Land Use Development Code and College Area Community Plan were not deemed to be significant impacts because SDSU is not subject to City and redevelopment agency plans and regulations (SDSU 2011).

3.2 Physically Divide an Established Community

It was determined in the Plaza Linda Verde Final EIR that the proposed project would not cause or result in significant impacts related to the division of an established community. Additionally, it was determined that the project would in fact further the preservation of the established residential neighborhoods in the vicinity of SDSU by increasing the supply of student housing and alleviating the demand for nuisance rentals in the surrounding single-family neighborhoods. It was also determined that the proposed project would be generally consistent with the land use plans for the area outlined by the City and the redevelopment agency. Thus, the project would be consistent with the established vision for the area (SDSU 2011).

3.3 Consistency with Applicable Habitat Conservation Plan or Natural Community Conservation Plan

Portions of the City are designated as a Multiple Habitat Preserve Area (MHPA). These areas are subject to the provisions of the San Diego Multiple Species Conservation Program (MSCP), which is intended to preserve sensitive habitats and species within the San Diego region. The project would be developed entirely within a previously developed area and would not be located in the City's MHPA. Because the project site is not located within the MHPA, it was determined that the project would not be subject to the provisions of the MSCP. Additionally, by focusing new development in an existing urban area, the Plaza Linda Verde Final EIR determined that the proposed project would be consistent with the goals and policies of the MHPA and the MSCP (SDSU 2011).

4 ANALYSIS OF PROJECT CHANGES

4.1 Consistency with Applicable Plans, Policies, and Regulations

The proposed project modifications would result in a one- to three-story building height increase relative to the originally proposed project, an increase in density of three dwelling units per acre (du/acre) relative to the originally proposed project, a minor reconfiguration of residential units within Buildings 1 and 2, and a slight increase in the number of parking spaces in Building 3. These modifications would not change the proposed building footprints and would not change the proposed land use of the project. Because the overall land use and building footprints would not change, any potential inconsistencies with the analysis in the Plaza Linda Verde Final EIR would involve height and density regulations found in the Land Use Development Code and in the College Area Community Plan rather than general goals contained in City and redevelopment agency land use plans. For this reason, this analysis focuses on building height and density as it relates to the Land Use Development Code and College Area Community Plan.

Building Height

Under the proposed project modifications, the heights of Buildings 1 and 2 would be increased from five stories to six stories, which would represent an increase of approximately 11 feet (10 feet, 10 inches) in building height. The height of Building 3 would be increased from four aboveground stories with one subterranean story to seven aboveground ground stories, which would represent an increase of approximately 40 feet in building height. The Plaza Linda Verde Final EIR stated that the original five-story buildings would be approximately 60 feet high (SDSU 2011). Under the proposed modifications, the heights of Buildings 1 and 2 would be increased to approximately 71 feet and the height of Building 3 would be increased to approximately 100 feet.

Buildings 1, 2, and 3 fall within the Land Use Development Code's CN-1-2 zone. The purpose of the CN (Commercial–Neighborhood) zone is to provide residential areas with access to a limited number of retail uses. The height limit in this zone is 30 feet (San Diego Municipal Code, Sections 131.0502 and 131.0531). The originally proposed project exceeded this height limit by 30 feet, and under the proposed modifications, this 30-foot exceedance would increase to a 41-foot exceedance for Buildings 1 and 2 and a 70-foot exceedance for Building 3. In the Plaza Linda Verde Final EIR, it was determined that inconsistencies with the Land Use Development Code would not result in a significant impact within the meaning of the California Environmental Quality Act (CEQA) because SDSU is not subject to the City of San Diego Land Development Code (SDSU 2011). The addition of 11 feet to the original height exceedance of

Buildings 1 and 2 and the addition of 40 feet to the original height exceedance of Building 3 would not change this determination.

Residential Density

Proposed project modifications would involve a decrease in commercial space and an increase in residential space in Buildings 1 and 2. Additionally, the one-story addition to each of these buildings that is part of the proposed modifications would also add more residential square footage. This increase in residential space would result in a minor increase in residential density.

The density analyzed in the Plaza Linda Verde Final EIR reflected the combined densities of all residential space proposed for the CN-1-2 zone of the Land Development Code and the Mixed Use Commercial/Residential zone of the College Area Community Plan. Buildings 1, 2, 4, and 5 are the proposed buildings containing residential uses that are located within both of these zones. The combined residential density of Buildings 1 through 5 under the originally approved project was approximately 92 du/acre, as stated in the Plaza Linda Verde Final EIR. The Land Development Code allows for a density of one dwelling unit per 1,500 square feet of lot area (San Diego Municipal Code, Section 131.0531), which equates to an allowable density of approximately 29 du/acre. Thus, it was determined that by proposing a density of 92 du/acre, the originally proposed project was inconsistent with the Land Development Code. The College Area Community Plan allows for densities of 75 to 110 du/acre within its Mixed Use Commercial/Residential zone (City of San Diego 1989, Figure 7b). Because the density proposed under the originally approved project fell within this range, it was deemed consistent with the College Area Community Plan with respect to density in the Mixed Use Commercial/Residential zone.

Using the "apartment equivalent" figures associated with Buildings 1 and 2 (see Table 2), residential density for Buildings 1, 2, 4, and 5 would increase from 92 du/acre to approximately 95 du/acre under the proposed modifications, a change that results from the proposed addition of a total of nine dwelling units to Buildings 1 and 2. This minor alteration in density would not change the conclusions of the Plaza Linda Verde Final EIR. With respect to the Land Development Code, the Plaza Linda Verde Final EIR determined that although the proposed project would be inconsistent with the allowable density under the Land Development Code, this inconsistency would not result in a significant impact within the meaning of CEQA because SDSU is not subject to the City of San Diego Land Development Code (SDSU 2011). Likewise, the addition of 3 du/acre to the original density exceedance would not change the determination made in the Plaza Linda Verde Final EIR. The modified project would still be inconsistent with the Land Development Code, and SDSU would still not be subject to the Land Development Code. With respect to the College Area Community Plan, the modified proposed project would

remain within the allowable density range, and the determination of consistency made in the Plaza Linda Verde Final EIR would remain the same.

Lot Coverage and Setback Requirements

The Plaza Linda Verde Final EIR identified potential inconsistencies between the proposed project and the lot coverage and setback requirements in the Land Development Code. The proposed project footprint would not change under the proposed modifications; thus, the potential inconsistencies with Land Development Code requirements for setbacks and lot coverage would remain the same, as would the original determination as to the significance of this inconsistency. For all inconsistencies with the Land Development Code, the Final Plaza Linda Verde EIR determined that these inconsistencies would not result in a significant impact within the meaning of CEQA because SDSU is not subject to the City of San Diego Land Development Code (SDSU 2011).

Land Use Plans

With the exception of an inconsistency with one of the recommendations provided in the College Area Community Plan, the originally approved project was deemed consistent with the guiding principles, goals, policies, and objectives of City and redevelopment agency land use plans. The proposed modifications would not alter the project to the extent that it would no longer be consistent with the guiding principles, goals, policies, and objectives of the nine City and redevelopment agency plans with which the originally proposed project was determined to be consistent. The modified proposed project would remain a mixed-use development that would implement the City of Villages Strategy, would accomplish many of the goals for the Core Subarea in accordance with redevelopment agency plans, and would not hinder the City from implementing other principles, goals, policies, objectives, and projects.

The recommendation provided in the College Area Community Plan with which the originally approved project was not consistent stated that SDSU should not extend beyond its existing boundaries (City of San Diego 1989). The originally approved project did expand the campus master plan boundary beyond its present boundaries, rendering the originally approved project inconsistent with this recommendation. However, the proposed modifications to the approved project would not alter the project footprint. Thus, the project would involve the same extension of the campus master plan boundaries, and the same determination made in the Plaza Linda Verde Final EIR would continue to apply to the modified project.

4.2 Physically Divide an Established Community

The Plaza Linda Verde Final EIR determined that the original project would not physically divide an established community (SDSU 2011). A one- to three-story increase in height and the addition of nine dwellings units would not alter the project to the extent that the modified project would physically divide an established community. Additionally, as modified, the project would still help SDSU achieve the goal of alleviating the demand for nuisance rentals in the surrounding single-family neighborhoods and to facilitate the preservation of the established residential neighborhoods in the vicinity of SDSU.

4.3 Consistency with Applicable Habitat Conservation Plan or Natural Community Conservation Plan

The Plaza Linda Verde Final EIR determined that the original project would not fall within the City's MHPA and would therefore not be subject to the provisions of the San Diego MSCP (SDSU 2011). Because the project site and the project footprint would not change, the modified project would remain consistent with the original determination that the project would not conflict with a habitat or natural community conservation plan.

5 CONCLUSIONS

The Plaza Linda Verde Final EIR noted that the project would be generally consistent with applicable plans, policies, and regulations with the exception of the City of San Diego Land Development Code and the College Area Community Plan. The Plaza Linda Verde Final EIR also established that the originally proposed project would not physically divide an established community and would not be located within an area subject to a habitat conservation plan or natural community conservation plan. The evaluation of the modified proposed project provided in this memorandum indicates that these original determinations would not change.

In summary, based on a review of the Plaza Linda Verde Final EIR and the revisions now proposed to the approved project, the proposed revisions would not result in any new significant effects, nor would the revisions result in a substantial increase in the severity of significant effects previously identified in the Final EIR. Because no new significant impacts would occur, and there would be no substantial increase in the severity of previously identified significant effects, no additional mitigation measures beyond those identified in the May 2011 Plaza Linda Verde Final EIR would be required.

6 REFERENCES

- City of San Diego. 1989. *College Area Community Plan*. San Diego, California: City of San Diego Planning Department. Adopted May 2, 1989. Updated August 5, 2002. Accessed March 20, 2014. http://www.sandiego.gov/planning/community/profiles/collegearea/plan.shtml.
- San Diego Municipal Code, Sections 131.0502 and 131.0531. Chapter 13: Zones, Article 1: Base Zones, Division 5: Commercial Base Zones. Accessed March 20, 2014. http://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division05.pdf.
- SDSU (San Diego State University). 2011. *Final Environmental Impact Report. Plaza Linda Verde. State Clearinghouse No. 2009011040*. Prepared for Board of Trustees of the California State University. Prepared by San Diego State University. May 2011.

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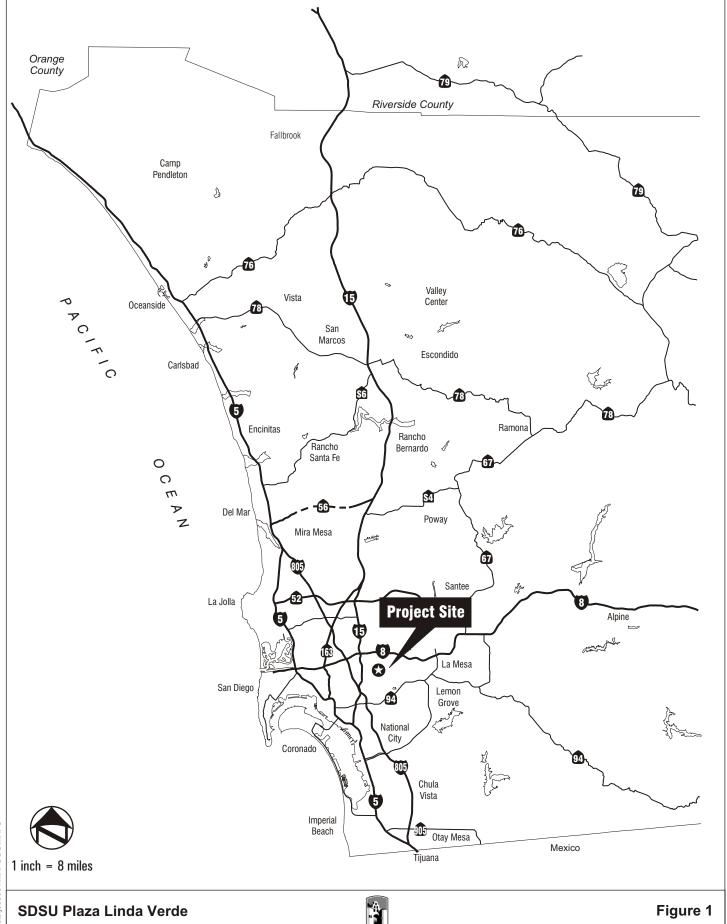
Sincerely,

Michele Webb

Environmental Planner

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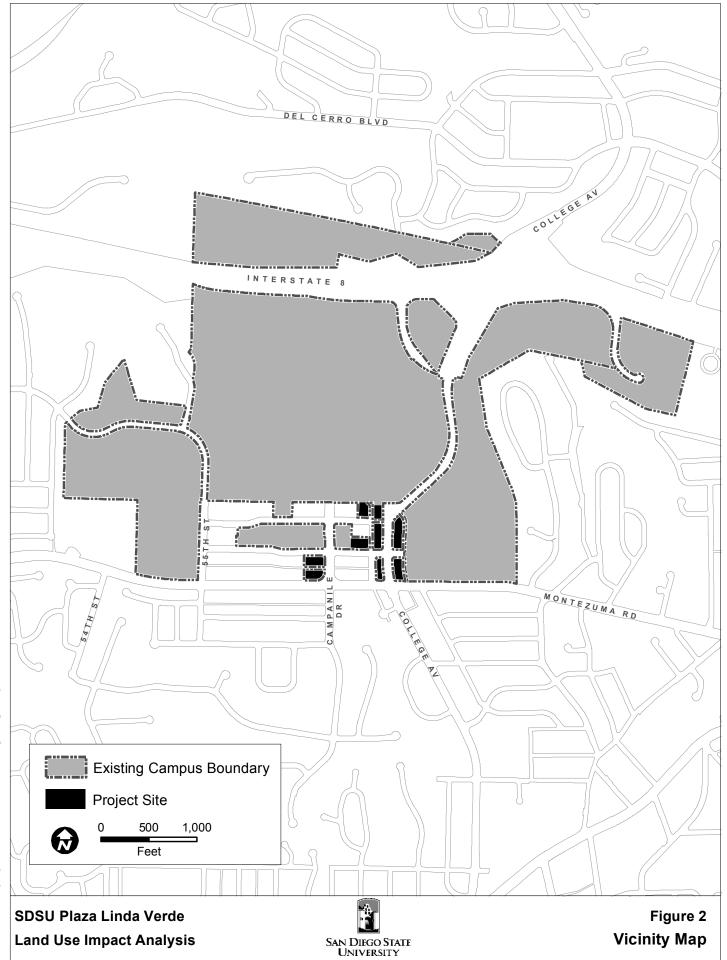
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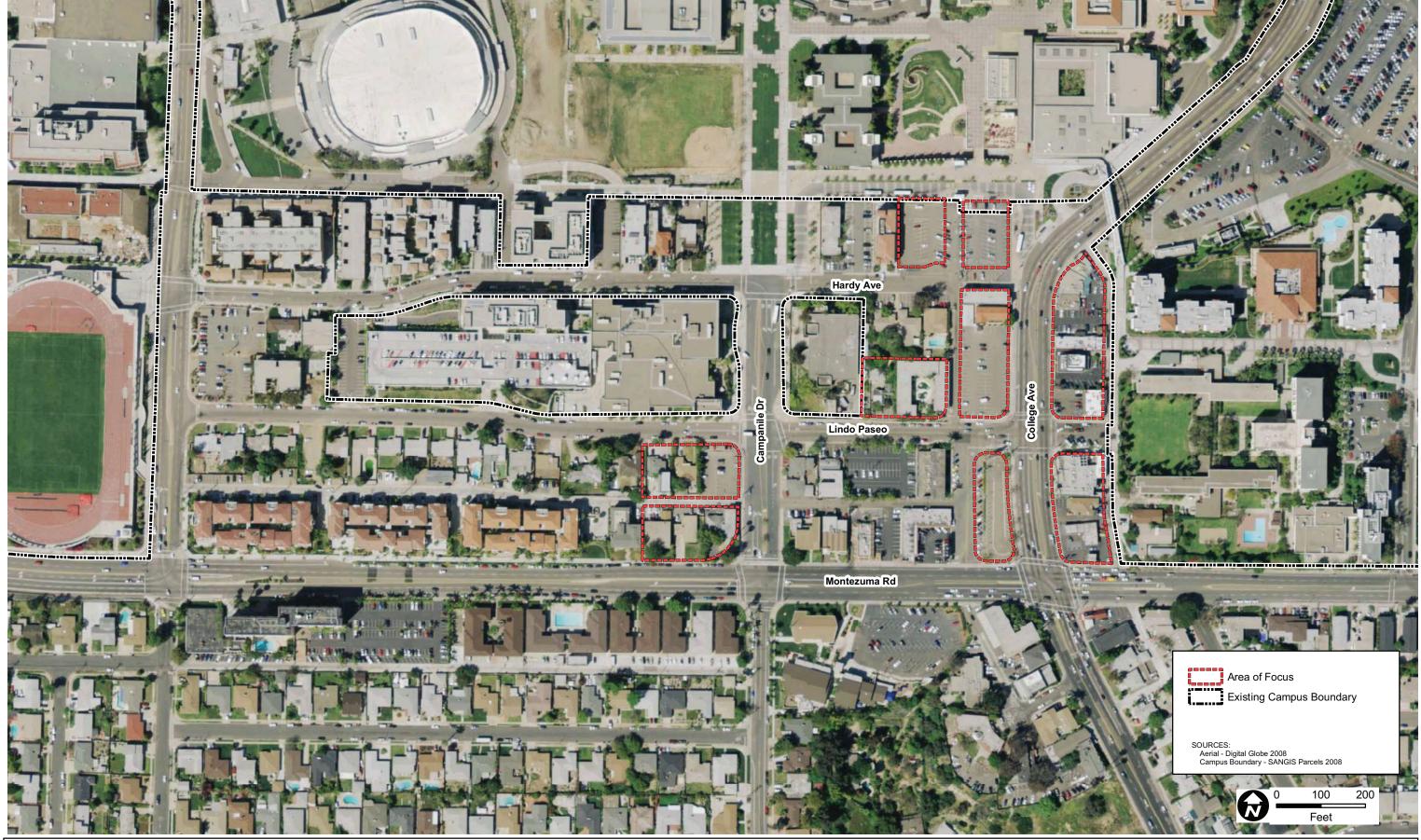
SAN DIEGO STATE UNIVERSITY **Regional Map**

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Land Use Impact Analysis



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SDSU Plaza Linda Verde Land Use Impact Analysis





SDSU Plaza Linda Verde Land Use Impact Analysis



Figure 4
Proposed Site Plan